

Data Submitted (UTC 11): 8/5/2015 6:00:00 AM

First name: Dick

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Organization:

Title:

Comments: [Caution: Suspicious Link]Comments on the Proposed Action for the treatment of invasive species that occur in the Boise and Sawtooth National Forests

August 5, 2015

Dear Supervisor Mullen and Ms. Brown,

"Our government is like a rich and foolish spendthrift who has inherited a magnificent estate in perfect order, and then has left his fields and meadows, forests and parks, to be sold and plundered and wasted."

Chief Edward Moody

"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has."

Margaret Mead

Supervisor Mullen, I have read the June 2015 initial Proposed Action for the treatment of invasive species that occur in the Boise and Sawtooth National Forests (PAIS). Please answer this question in the final NEPA document. Why do you reject best science authored by unbiased, independent scientists and instead rely of outdated USFS NEPA documents and the advice of your employees whose knowledge of herbicide safety is also based on this untrue information contained in research by a single lab?

Have you watched the news on TV or read the newspapers this month. If you did, and cared about the lives of the wildlife, fish and people who visit the Boise and Sawtooth National Forests you would have included information online and in letters to your hardcopy mailing list indicating no herbicides that contain glyphosate will be applied anywhere for any reason.

Obviously you and your IDT members have not heard of the Precautionary Principle. Responsible people that contemplate any action intuitively engage the Precautionary Principle. Perhaps you and your IDT members have never heard of it. Here it is in a nutshell:

"The precautionary principle or precautionary approach states that if an action or policy has a suspected risk of causing harm to the http://en.wikipedia.org/wiki/General_public public or to the http://en.wikipedia.org/wiki/Natural_environment environment, in the absence of http://en.wikipedia.org/wiki/Scientific_consensus scientific consensus that the action or policy is not harmful, the http://en.wikipedia.org/wiki/Legal_burden_of_proof burden of proof that it is not harmful falls on those taking an action.

See: http://en.wikipedia.org/wiki/Precautionary_principle

Don't depend on the validity on the safety reports prepared by independent labs. Since Monsanto pays them to prepare the report do you really think the report will say anything that might cause the public to avoid herbicides that contain glyphosate?

As you and your IDT members know, corporations have undue control over America today. A corporation such as Monsanto with \$15.8 billion in annual revenue (2014) will convince an EPA employee to determine "Roundup is safe if used according to label directions." Guess who composes the text on the labels?

The Pending Decision

Supervisor Mullen, if you witlessly and consciously sign a decision document to implement the Proposed Action with the knowledge contained below you will seldom have days that you don't wonder what species is experiencing a painful death from cancer because of you. If being responsible for the death of wildlife species is no big deal to you, please understand you differ from the vast majority of Americans. Never forget that humans will likely also be exposed to glyphosate poison. This includes forest visitors (including children) and people who will be spraying the poison.

Remember, these comments will be on file and available to forward to anyone (including attorneys) at any time.

If you didn't catch-up on the news or if you care more about Monsanto profit than peoples lives here's what the public knows:

Monsanto weed killer can 'probably' cause cancer: World Health Organization

Published by Reuters, March 20, 2015

<<http://www.reuters.com/article/2015/03/20/us-monsanto-roundup-cancer-idUSKBN0MG2NY20150320>>
<http://www.reuters.com/article/2015/03/20/us-monsanto-roundup-cancer-idUSKBN0MG2NY20150320>

World Health Organization labels Roundup a 'probable carcinogen,' Monsanto strongly disagrees

Broadcast on Mid-Missouri public radio, March 24, 2015

<<http://kbia.org/post/world-health-organization-labels-roundup-probable-carcinogen-monsanto-strongly-disagrees>> <http://kbia.org/post/world-health-organization-labels-roundup-probable-carcinogen-monsanto-strongly-disagrees>

World's Leading Health Organization Declares Glyphosate "Probably carcinogenic to humans". It's time to Ban Monsanto's Roundup

Published by Food Democracy Now! March 26, 2015

<<http://www.fooddemocracynow.org/blog/2015/mar/26>> <http://www.fooddemocracynow.org/blog/2015/mar/26>

WHO Glyphosate Report Ends Thirty Year Cancer Cover Up

Published by Sustainable Pulse, March 26, 2015

<http://sustainablepulse.com/2015/03/26/who-glyphosate-report-ends-thirty-year-cancer-cover-up#.VRSeSpbn_IU> http://sustainablepulse.com/2015/03/26/who-glyphosate-report-ends-thirty-year-cancer-cover-up#.VRSeSpbn_IU

New glyphosate review finds it a probable cause of lymphoma, chromosome damage.

Published by Planet Natural, March 2015

<<http://www.planetnatural.com/roundup-cancer/>> <http://www.planetnatural.com/roundup-cancer/>

Research Arm of World Health Organization Labels Glyphosate "Probably" Carcinogenic

Broadcast on American Ag radio network, March 23, 2015

<<http://americanagnetwork.com/2015/03/research-arm-of-world-health-organization-labels-glyphosate-probably-carcinogenic/>> <http://americanagnetwork.com/2015/03/research-arm-of-world-health-organization-labels-glyphosate-probably-carcinogenic/>

Glyphosate probably carcinogenic

Published by Point Reyes Light, March 26, 2015

<<http://www.ptreyeslight.com/article/glyphosate-probably-carcinogenic>>
<http://www.ptreyeslight.com/article/glyphosate-probably-carcinogenic>

Roundup a 'probable carcinogen' World Health Organization finds

Published in the Statesman Journal (Salem, Oregon), March 20, 2015

<<http://www.statesmanjournal.com/story/tech/science/environment/2015/03/20/roundup-probable-carcinogen-world-health-organization-finds/25109875/>>
<http://www.statesmanjournal.com/story/tech/science/environment/2015/03/20/roundup-probable-carcinogen-world-health-organization-finds/25109875/>

World Health Organization: Monsanto's RoundUp 'Probably' Causes Cancer

Published in the Ben Swann Newsletter, March 23, 2015

<<http://benswann.com/world-health-organization-monsantos-roundup-probably-causes-cancer/>>
<http://benswann.com/world-health-organization-monsantos-roundup-probably-causes-cancer/>

Supervisor Mullen, there are scores of other public alerts. This should establish the fact that you "know" about this tragic chemical that's likely one of the causes for the current cancer epidemic in America.

Federal officials who knowingly take action that will place public health and safety in jeopardy by "concealing" important information violate 18 U.S.C. [sect] 1001 and are thus subject to up to 8 years in prison.

Table 2 at page 7 of the PAIS indicates glyphosate will be applied.

Glyphosate is a toxic chemical manufactured by Monsanto. There are many formulations of herbicides containing glyphosate. The majority are quite toxic to fish, birds and mammals (including humans). This includes so-called aquatic formulations. Several are potentially lethal carcinogens. The PAIS does not specify the formulation that will be applied.

Thus, neither the public nor the Responsible Official knows if other living things besides non-native plants will die. It seems more than reasonable for the Responsible Official to notify families with kids (who are particularly susceptible to glyphosate poisoning) that they are taking risks when they use the Umpqua National forest for outdoor fun.

Of course the Responsible Official will stop at nothing trying to disprove and ridicule the authors and source documents in Opposing Views Attachment #9a. How? The Responsible Official will claim they are:

not peer reviewed,

"gray" literature,

trade journals,

only published by environmental organizations, newspapers, magazines, and internet blogs, and

just opinions

All herbicides are not the same. Of course they are all toxic. All formulations of herbicides containing glyphosate are very toxic.

Any reasonable person who is aware of the recently announced research conclusions wouldn't think of applying a glyphosate containing herbicide on their own property or public land. Knowingly doing otherwise will have severe penalties if and when a member of the public gets cancer and can prove they were in the forest where the poison was applied.

"The International Agency for Research on Cancer (IARC), a division of the World Health Organization, released a report today reviewing the cancer risk associated with five pesticides, including glyphosate.

The report suggested that glyphosate may increase the risk of non-Hodgkin lymphoma in people who are exposed to the chemical in their occupation.

The report authors also said some studies show that exposure to glyphosate and glyphosate formulations promoted tumours in laboratory mice.

Consequently, the IARC classified glyphosate as Group 2A: "probably carcinogenic to humans."

"This category is used when there is limited evidence of carcinogenicity in humans and sufficient evidence of carcinogenicity in experimental animals," IARC said.

Monsanto said IARC's conclusion is not supported by scientific data and the agency ignored relevant studies."

Source: "UN body declares glyphosate probable human carcinogen"

Published in the Western Producer, March 20, 2015

<<http://www.producer.com/2015/03/un-body-declares-glyphosate-probable-human-carcinogen/>>
<http://www.producer.com/2015/03/un-body-declares-glyphosate-probable-human-carcinogen/>

"Lyon, France, 20 March 2015 - The International Agency for Research on Cancer (IARC), the specialized cancer agency of the World Health Organization, has assessed the carcinogenicity of five organophosphate pesticides. A summary of the final evaluations together with a short rationale have now been published online in The Lancet Oncology, and the detailed assessments will be published as Volume 112 of the IARC Monographs.

What were the results of the IARC evaluations?

The herbicide glyphosate and the insecticides malathion and diazinon were classified as probably carcinogenic to humans (Group 2A)."

Source: "IARC Monographs Volume 112: evaluation of five organophosphate insecticides and herbicides"

World Health Organization, International Agency for Research on Cancer, March 20, 2015

<<http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>> <http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>

"According to a review of studies published on agricultural chemicals published in the medical journal <<http://www.scribd.com/doc/259676962/Carcinogenicity-of-Tetrachlorvinphos-Parathion-Malathion-Diazinon-And-Glyphosate#scribd>> The Lancet, the group of international cancer researchers found "limited evidence" of glyphosate-the "highest global production volume herbicide" on the market-causing cancer in humans, specifically non-Hodgkin's lymphoma. Studies of occupational exposure to glyphosate in the United States, Canada, and Sweden "reported increased risks for non-Hodgkin lymphoma that persisted after adjustment for other pesticides." In studies of rodents, glyphosate has been linked with a number of different cancers."

Source: "The World's Most Popular Weed Killer Can 'Probably' Cause Cancer"

Published by Takepart Daily, March 23, 2015

<<http://www.takepart.com/article/2015/03/23/popular-herbicide-probably-carcenogenic?cmpid=tpdaily-eml-2015-03-23>> <http://www.takepart.com/article/2015/03/23/popular-herbicide-probably-carcenogenic?cmpid=tpdaily-eml-2015-03-23>

How bout it Supervisor Mullen, you have a choice. You can witlessly prop-up Monsanto or do what any other reasonable person would do.

Supervisor Mullen, did you know that in 2001 Secretary of Agriculture Vilsack was named him 'governor of the year' by the Biotechnology Industry Organization for his support of the industry's economic growth and agricultural biotechnology research? Did you know that Vilsack has supported several measures reducing the power of local governments to regulate agribusiness operations. Here's more:

<<http://www.counterpunch.org/2008/12/18/another-shill-for-monsanto/>>
<http://www.counterpunch.org/2008/12/18/another-shill-for-monsanto/>

Since Vilsack was appointed the USDA he has supported the use of extremely toxic herbicides in spite of the warnings. Why? Herbicide use increases the profit for farmers [hellip] and manmade chemical manufacturers like Monsanto. It's all about money.

The USDA has pushed herbicide use despite the massive amount of independent research conclusions that show some of the herbicides pushed by the USDA should never be used in areas where humans (especially children) might be found. The USDA refuses to acknowledge the danger. Please examine the following information reporting the USDA's senseless support for dangerous pesticide use:

USDA Approves Toxic Herbicide Amidst Great Public Outcry

Published in Health Impacts News, January 11, 2015

<<http://healthimpactnews.com/2014/usda-approves-toxic-herbicide-amidst-great-public-outcry/>>
<http://healthimpactnews.com/2014/usda-approves-toxic-herbicide-amidst-great-public-outcry/>

USDA refuses to test foods for glyphosate contamination, says pesticides are safe to eat

by Jonathan Benson, staff writer

Published in Natural News, January 9, 2015

<http://www.naturalnews.com/048237_glyphosate_contamination_USDA.html>
http://www.naturalnews.com/048237_glyphosate_contamination_USDA.html

<<http://agrihunt.com/agri-news/6528-usda-refuses-to-test-foods-for-glyphosate-contamination.html>>
<http://agrihunt.com/agri-news/6528-usda-refuses-to-test-foods-for-glyphosate-contamination.html>

<<http://carlislewellnessnetwork.blogspot.com/2015/01/usda-refuses-to-test-foods-for.html>>
<http://carlislewellnessnetwork.blogspot.com/2015/01/usda-refuses-to-test-foods-for.html>

In 2009, a French court found <<http://articles.mercola.com/sites/articles/archive/2009/11/21/France-Finds-Monsanto-Guilty-of-Lying.aspx>> Monsanto guilty of lying; falsely advertising its
<<http://articles.mercola.com/sites/articles/archive/2012/01/15/dr-don-huber-interview-part-2.aspx>> Roundup herbicide as "biodegradable," "environmentally friendly" and claiming it "left the soil clean."

<<http://articles.mercola.com/sites/articles/archive/2014/05/20/glyphosate-roundup-levels.aspx>>
<http://articles.mercola.com/sites/articles/archive/2014/05/20/glyphosate-roundup-levels.aspx>

USDA Organic Standards Allow for Residue of Pesticides

Published in Health Impacts News, January 11, 2015

<<http://healthimpactnews.com/2014/the-glyphosate-contamination-of-organic-food-an-update/>>
<http://healthimpactnews.com/2014/the-glyphosate-contamination-of-organic-food-an-update/>

USDA report says pesticide residues in food nothing to fear

Published by Reuters, December 19, 2014

<<http://www.reuters.com/article/2014/12/19/us-usda-pesticides-report-idUSKBN0JX2FZ20141219>>
<http://www.reuters.com/article/2014/12/19/us-usda-pesticides-report-idUSKBN0JX2FZ20141219>

USDA's Annual Report on Pesticide Residues Says Levels Still Safe

Published in Food Safety News, December 24, 2014

<<http://www.foodsafetynews.com/2014/12/usdas-annual-report-on-pesticides-says-levels-still-safe/#.VLNC7JbTnIU>> <http://www.foodsafetynews.com/2014/12/usdas-annual-report-on-pesticides-says-levels-still-safe/#.VLNC7JbTnIU>

<<http://www.independentsciencenews.org/news/how-extreme-levels-of-roundup-in-food-became-the-industry-norm/>> How "Extreme Levels" of Roundup in Food Became the Industry Norm

By Thomas B[oslash]hn and Marek Cuhra

Published in Independent Science News, March 24, 2014

<<http://www.independentsciencenews.org/news/how-extreme-levels-of-roundup-in-food-became-the-industry-norm/>> <http://www.independentsciencenews.org/news/how-extreme-levels-of-roundup-in-food-became-the-industry-norm/>

Glyphosate and Children

Autism Will Afflict Half Of The American Children By 2025, And Glyphosate Is To Blame, MIT Doctor Says

Published in Inquisitr, January 7, 2015

<<http://www.inquisitr.com/1735694/autism-will-afflict-half-of-the-american-children-by-2025-and-glyphosate-is-to-blame-mit-doctor-says/>> <http://www.inquisitr.com/1735694/autism-will-afflict-half-of-the-american-children-by-2025-and-glyphosate-is-to-blame-mit-doctor-says/>

Glyphosate Toxicity -- The exposure of children to glyphosate should be avoided as recent animal studies have shown that commercial formulation of glyphosate is a potent endocrine (hormone) disruptor, causing disturbances in reproductive development when the exposure was during the puberty period

Published in Healthy Environmental Group

<<http://www.healthyenvironmentgroup.org/glyphosate-toxicity.html>>
<http://www.healthyenvironmentgroup.org/glyphosate-toxicity.html>

Supervisor Mullen, have you ever wondered why there's a cancer epidemic in America? Do you know why people living in undeveloped countries with no manufactured chemicals have cancer rates significantly less than America with far superior medicine? There are alternatives to deal with non-native plant species: 1) a few safer herbicides, 2) hand pulling and 3) biological control. Please read this excerpt:

"The USPCP and many scientific researchers have expressed concern that the current toxicology testing methodologies are grossly inadequate for children.

The USPCP report stated, "They [children] are at special risk due to their smaller body mass and rapid physical development, both of which magnify their vulnerability to known or suspected carcinogens, including radiation." "

Link to entire document: <http://www.organicconsumers.org/articles/article_31528.cfm>
http://www.organicconsumers.org/articles/article_31528.cfm

Supervisor Mullen, your attempt to prop-up Monsanto by trying to hide the fact that you will be exposing the public to extremely toxic herbicides has failed. . Now you know. Ranger Mulholland, knowingly and consciously taking action that could or might permanently harm someone's health is illegal.

Supervisor Mullen, since you have read these comments you are now on record as being aware that exposure to some herbicides that contain glyphosate (especially Roundup) has been shown to cause horrible, debilitating ailments to forest wildlife and human visitors who come in contact with the poison. Your job is to eradicate noxious weeds. Please do so in a safe manner. It will cost a little more, but the public will consider this a wise investment. Doing the wrong thing just because you can isn't a trait of a caring, thinking person.

Please read about Monsanto's fraudulent safety testing schemes:

<http://www.gmfrecymru.org/documents/fraud_roundup.htm>
http://www.gmfrecymru.org/documents/fraud_roundup.htm

<<http://www.naturescountrystore.com/roundup/>> <http://www.naturescountrystore.com/roundup/>

<https://www.organicconsumers.org/old_articles/ge/testing112403.php>
https://www.organicconsumers.org/old_articles/ge/testing112403.php

<<http://farmwars.info/?p=13662>> <http://farmwars.info/?p=13662>

<https://www.organicconsumers.org/old_articles/dioxcov.html>
https://www.organicconsumers.org/old_articles/dioxcov.html

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.

One again, it's critical that American tax dollars be spent on eradicating noxious weeds safely. It's criminal to risk causing the devastating health problems scientific research conclusions indicate are caused by glyphosate contact. Consider these comments including Opposing Views Attachment #9a as notification that if you proceed with glyphosate application you are covering up glyphosate health risks per section (a)(1) of 18 U.S.C. [sect] 1001 quoted below, therefore you are aware of what you are about to do.

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully -

(1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;

(2) makes any materially false, fictitious, or fraudulent statement or representation; or

(3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

(b) Subsection (a) does not apply to a party to a judicial proceeding, or that party's counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.

(c) With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to -

(1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or

(2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate. - See more at:

<<http://codes.lp.findlaw.com/uscode/18/II/47/1001#sthash.ChXNLypx.dpuf>>

<http://codes.lp.findlaw.com/uscode/18/II/47/1001#sthash.ChXNLypx.dpuf>

There is information widely available that discusses the dangers and toxicity of some herbicide products sold over-the-counter in America. As you will learn below, other countries protect their citizens by taking the vast amount of scientific information seriously.

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.

Here's more. Most people could not sleep knowing they took this risk:

<http://grist.org/business-technology/so-roundup-probably-causes-cancer-this-means-what-exactly/?utm_campaign=daily_feed&utm_medium=email&utm_source=newsletter>
http://grist.org/business-technology/so-roundup-probably-causes-cancer-this-means-what-exactly/?utm_campaign=daily_feed&utm_medium=email&utm_source=newsletter

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

In Opposing Views Attachment #9a I have quoted 173 Ph.D. independent Ph.D. scientists who all describe horrendous health effects to mammals (including humans), birds and fish that result from contact with certain glyphosate-containing herbicide formulations. There are 104 source documents for these professional opinions.

Any reasonable, unbiased, intelligent person would conclude that the documents critical of some glyphosate herbicide formulations (specifically Roundup) were consciously excluded. Monsanto claims drinking Roundup is as safe as drinking water.

Are you prepared to make an independent, fully-informed Decision using the Precautionary Principle wisdom regarding glyphosate use where children might play? Please see below:

"When an activity raises threats of harm to the environment or human health, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically."

Source: <<http://www.sehn.org/ppfaqs.html>> <http://www.sehn.org/ppfaqs.html>

Comment: Ranger Mulholland, 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>>

<http://www.bing.com/search?q=glyphosate+cancer&qsn=&form=QBLH&pq=glyphosate+cancer∓sc=2-17&sp=-1&sk=&cvid=a9a7e18786764443aa59079d8144f559>

Supervisor Mullen, 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. Monsanto composes and prints the label directions!

There are no formulations of glyphosate-containing herbicides that are safe to use near water. Please read this science on the effects of different formulations of glyphosate-containing herbicides on species associated with the aquatic environment:

<<http://cdn.intechweb.org/pdfs/12592.pdf>> <http://cdn.intechweb.org/pdfs/12592.pdf>

Opposing Views Attachment 9a contains 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 are linked to the following health problems in mammals (including humans):

[middot] birth defects,

[middot] non-Hodgkin's lymphoma (a form of cancer),

[middot] mitochondrial damage,

[middot] cell asphyxia,

[middot] miscarriages,

[middot] attention deficit disorder,

[middot] endocrine disruption,

[middot] DNA damage,

[middot] skin tumors,

[middot] thyroid damage,

[middot] hairy cell leukemia (another cancer),

[middot] Parkinson disease,

[middot] premature births,

[middot] decrease in the sperm count,

[middot] harm to the immune system in fish

[middot] death of liver cells,

[middot] severe reproductive system disruptions

[middot] and chromosomal damage.

Comment: Supervisor Mullen, 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.twinside.org.sg/title/service76.htm>> <http://www.twinside.org.sg/title/service76.htm>

Comment: Supervisor Mullen, 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>> <http://www.i-sis.org.uk/about.php> and

<http://www.i-sis.org.uk/Ban_Glyphosate_Herbicides_Now.php> 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/> <http://permaculturenews.org/2012/11/01/why-glyphosate-should-be-banned-a-review-of-its-hazards-to-health-and-the-environment/>

Comment: Supervisor Mullen, would you apply a chemical to your yard where children play in the grass that Italy wants banned for use in Italy? See:

<<http://ultraculture.org/blog/2013/07/24/italy-throw-out-monsanto-us-asleep/>>
<http://ultraculture.org/blog/2013/07/24/italy-throw-out-monsanto-us-asleep/>

Comment: Supervisor Mullen, 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#>
http://www.naturalnews.com/042608_El_Salvador_glyphosate_ban_Monsanto.html#

Comment: Supervisor Mullen, 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>>
<http://www.icij.org/blog/2014/03/sri-lanka-bans-leading-monsanto-herbicide-citing-deadly-disease-fears>

Comment: If you think it's inappropriate to use chemicals banned for use in other countries in your yard when children play, then why do you propose applying the poison glyphosate to public land? Please respond. This is not a rhetorical question.

Ask yourself why the poison called glyphosate is banned for use in 3rd world countries and still allowed in the United States. Now ask yourself why Congress included Section 735 in the 2013 spending bill (HR 933) that was signed by President Obama. Section 735 is known by many as the "Monsanto Protection Act." See:

<<http://www.ibtimes.com/monsanto-protection-act-5-terrifying-things-know-about-hr-933-provision-1156079>>
<http://www.ibtimes.com/monsanto-protection-act-5-terrifying-things-know-about-hr-933-provision-1156079>

Read the literature at the link below to learn what any government agency must do before applying poison:

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

Are you still unsure about Monsanto's glyphosate safety? Please read this article in the April 2013 issue of Entropy magazine called: "Glyphosate's Suppression of Cytochrome P450 Enzymes and Amino Acid Biosynthesis by the Gut Microbiome: Pathways to Modern Diseases"

<<http://www.mdpi.com/1099-4300/15/4/1416>> <http://www.mdpi.com/1099-4300/15/4/1416>

Are you still unsure about Monsanto's glyphosate safety? Please read this article in the October 2014 issue of Brazilian Journal of Microbiology called: "Influence of Monsanto's Roundup Herbicide (Glyphosate) on Growth of Pathogenic Bacteria: Study"

<<http://www.globalresearch.ca/influence-of-monsantos-roundup-herbicide-glyphosate-on-growth-of-pathogenic-bacteria-study/5422558>> <http://www.globalresearch.ca/influence-of-monsantos-roundup-herbicide-glyphosate-on-growth-of-pathogenic-bacteria-study/5422558>

We know Glyphosate-containing herbicides are potentially lethal[hellip] 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+&q=n&form=QBLH&pq=monarch+decline+monsanto%E2%80%99s+roundup+&sc=0-0&sp=-1&sk=&cvid=d8d3b58795f4444abadf6dc2835f8020>>
<http://www.bing.com/search?q=monarch+decline+Monsanto%E2%80%99s+Roundup+&q=n&form=QBLH&pq=monarch+decline+monsanto%E2%80%99s+roundup+&sc=0-0&sp=-1&sk=&cvid=d8d3b58795f4444abadf6dc2835f8020>

<<https://mail.google.com/mail/?pli=1#inbox/14ba7fbdb08848f0>>
<https://mail.google.com/mail/?pli=1#inbox/14ba7fbdb08848f0>

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>>
<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>> <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 Andhra 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>> <http://www.mdpi.com/1660-4601/11/2/2125>

Would the International Agency for Research on Cancer have reason to publish a story that is not true?

"Analyzing 44 individual research projects published since 1980, the scientists, writing in the <<http://www.ncbi.nlm.nih.gov/pubmed/24762670>> International Journal of Environmental Research and Public Health, said that people exposed to the weed killer glyphosate, marked by Monsanto under the brand name Roundup, had double the risk of developing non-Hodgkin's lymphoma."

Study: Glyphosate Doubles Risk of Lymphoma

By <<http://www.ewg.org/staff/emily-cassidy>> Emily Cassidy, Biofuels Research Analyst

AgMag BLOG, May 23, 2014

Link: <<http://www.ewg.org/agmag/2014/05/study-glyphosate-doubles-risk-lymphoma>>
<http://www.ewg.org/agmag/2014/05/study-glyphosate-doubles-risk-lymphoma>

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>> <https://www.ncbi.nlm.nih.gov/pubmed/24549493>

If you believe the outdated, biased USFS sources that show herbicides containing glyphosate are safe you will live the rest of your life wondering. Any reasonable, thinking, ethical person with this knowledge would deal with noxious weeds with the slightly more expensive alternatives to chemicals.

The USFS has no mandate to prop-up Monsanto does it?

Here's more:

Most Honey, Including Organic, Contains Monsanto Roundup Herbicide's Toxic Glyphosates

Excerpt: "Five categories of food items were tested from Philadelphia grocery stores: honey, corn and pancake syrup, soy milk, tofu, and soy sauce. Sixty-two percent of the conventional honeys and 45% of the organic honeys sampled had levels of glyphosates above the minimum established limits

<<http://www.globalresearch.ca/most-honey-including-organic-contains-monsanto-roundup-herbicides-toxic-glyphosates/5431840>> <http://www.globalresearch.ca/most-honey-including-organic-contains-monsanto-roundup-herbicides-toxic-glyphosates/5431840>

Comment: Indeed, the USFS is killing us slowly to please Monsanto executives [hellip] and Secretary Vilsack.

Glyphosate -Human Health and Ecological Risk Assessment Final Report

<<http://www.klamathforestalliance.org/Documents/glyphosate.pdf>>
<http://www.klamathforestalliance.org/Documents/glyphosate.pdf>

" <<http://www.ncbi.nlm.nih.gov/pubmed/12189223>> Striking <<http://www.ncbi.nlm.nih.gov/pubmed/17134891>> increases in the incidence of non-Hodgkin lymphoma cancer have occurred over the past 30 years. A 2014 <<http://www.ncbi.nlm.nih.gov/pubmed/24762670>> systematic review and meta-analysis of epidemiology studies broke down the relationship between non-Hodgkin lymphoma and occupational exposure to agricultural pesticides by group and by active ingredient.

Among the findings - a handful of those studies identified a positive association between glyphosate and B cell lymphoma (a type of non-Hodgkin lymphoma).

Given the information gaps in the chemical registration process (<http://www.panna.org/blog/eu-sparks-brouhaha-over-endocrine-disruptors>) considerations of endocrine disruption in risk assessment, anyone?) and the fact that we know it can take years for science to catch up with pesticide effects, even pesticides like glyphosate that are described as "less toxic" should still raise big questions and be closely tracked."

"Roundup Ready" nears the end of the line

By Emily Marquez

GroundTruth, July 7, 2014

Link: <http://www.panna.org/blog/roundup-ready-nears-end-line> <http://www.panna.org/blog/roundup-ready-nears-end-line>

"Monsanto's herbicide Roundup has been linked to a mysterious fatal kidney disease epidemic that has appeared in Central America, Sri Lanka and India."

"We know that political changes in Sri Lanka in the late 1970s led to the introduction of agrochemicals, especially in rice farming. The researchers looked for likely suspects. Everything pointed to <http://en.wikipedia.org/wiki/Glyphosate> glyphosate. This herbicide is used in abundance in Sri Lanka. Earlier <http://rt.com/news/monsanto-roundup-kidney-disease-921/> studies had shown that once glyphosate binds with metals, the glyphosate-metal complex can last for decades in the soil.

Glyphosate was not originally designed for use as an herbicide. Patented by the Stauffer Chemical Company in 1964, it was introduced as a <http://www.mdpi.com/1660-4601/11/2/2125> chelating agent. It avidly binds to metals. <http://www.mdpi.com/1660-4601/11/2/2125> Glyphosate was first used as a descaling agent to clean out mineral deposits from the pipes in boilers and other hot water systems.

It is this chelating property that allows glyphosate to form complexes with the arsenic, cadmium and other heavy metals found in the groundwater and soil in Central America, India and Sri Lanka. The glyphosate-heavy metal complex can enter the human body in a variety of ways. The complex can be ingested, inhaled or absorbed through the skin. Glyphosate acts like a Trojan horse, allowing the bound heavy metal to avoid detection by the liver, since the glyphosate occupies the binding sites that the liver would normally latch onto. The glyphosate-heavy metal complex reaches the kidney tubules, where the high acidity allows the metal to break free of the glyphosate. The cadmium or arsenic then damages the kidney tubules and other parts of the kidneys, ultimately resulting in kidney failure and, most often, death."

"Monsanto's Herbicide Linked to Fatal Kidney Disease Epidemic: Could It Topple the Company?"

By <http://www.truth-out.org/author/itemlist/user/49779> Jeff Ritterman, M.D.

Truthout, July 10, 2014

Link: <<http://www.truth-out.org/news/item/24876-monsantos-herbicide-linked-to-fatal-kidney-disease-epidemic-will-ckdu-topple-monsanto>> <http://www.truth-out.org/news/item/24876-monsantos-herbicide-linked-to-fatal-kidney-disease-epidemic-will-ckdu-topple-monsanto>

Are you still sure of yourself? Read:

<<http://www.greenmedinfo.com/blog/surprise-monsanto-funded-research-finds-their-products-safe>>
<http://www.greenmedinfo.com/blog/surprise-monsanto-funded-research-finds-their-products-safe>

<<http://kettlerange.org/weeds/Chapter-3.html>> <http://kettlerange.org/weeds/Chapter-3.html>

<<http://www.boulderweekly.com/article-12640-muzzled-by-monsanto.html>>
<http://www.boulderweekly.com/article-12640-muzzled-by-monsanto.html>

<<http://www.ringoffireradio.com/2013/12/monsanto-wins-journal-retracts-study-citing-dangers-gm-corn-roundup/>>
<http://www.ringoffireradio.com/2013/12/monsanto-wins-journal-retracts-study-citing-dangers-gm-corn-roundup/>

Ranger Mulholland, most of the human and non-human animal deaths caused by glyphosate exposure will be cancer-related.

I suggest you read 18 U.S.C. [sect] 1001 and the Administrative Procedures Act.

The courts are aware of the USDA's illegal herbicide use. Please see the sample of court cases below. Ignoring this clear evidence violates the APA.

In *Californians for Alternatives to Toxics, et al. v. Michael Dombeck*, Civ. S-00-2016 LKK/JFM (2001), Judge Lawrence Karleton presiding in the United States District Court for the Eastern District of California made the following findings:

"The Forest Service cannot proceed with the plan until it assesses how use of the herbicides would affect the spread of noxious weeds and considers new information that calls into question earlier Forest Service findings that use of the herbicides would not harm humans and wildlife."

The choice is yours Supervisor Mullen. Can you now understand that the evidence overwhelmingly indicates some glyphosate herbicides are potent carcinogens? There are thousands of sites on the WEB that clearly indicate glyphosate is potentially lethal. Incredibly, you depend on a single document endorsed by the USDA declaring that glyphosate is safe. The USDA has supported the use of toxic manufactured chemicals for decades. They still support GMO crops modified to withstand massive amounts of science clearly showing human health is affected. You can kill humans, fish and terrestrial wildlife using trumped-up USDA safety studies or you can believe independent science in *Opposing Views Attachment #9a*. Have you ever watched a child deal with cancer?

If you still choose to ignore this warning then you must act according to NLRB rules. Private industry must notify workers when they will be required to work under conditions that are potentially fatal. Please make hardcopies of this section of these comments and *Opposing Views Attachment #9a* and give them to the people who will be applying the herbicides that contain glyphosate. Also, mail them to the worker's family

There are alternatives to herbicides. Spend a little more money using mechanical and/or biological control. I guarantee you will sleep better [hellip] especially when you think of kids.

Glyphosate is driving the Monarch butterfly species to extinction.

<<https://mail.google.com/mail/?shva=1#inbox/148043eb3ca4fb6b>>
<https://mail.google.com/mail/?shva=1#inbox/148043eb3ca4fb6b>

Please don't do something tragic just because the USFS says you can. It's time for independent thinking isn't it?

Monsanto spends millions \$\$ each year on their ongoing PR campaign. Don't believe it.

You are not exempt from the provisions of the Administrative Procedures Act. Under the APA, a court may set aside an agency action if the court determines that the action is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. [sect] 706(2)(A); see also Marsh, 490 U.S. at 375-77 (arbitrary and capricious standard applies to agency findings which involve agency expertise). Here's an excerpt from this opinion:

"Consequently, we may reverse the decision as arbitrary or capricious only if the agency relied on factors Congress did not intend it to consider, entirely failed to consider an important aspect of the problem, offered an explanation that ran counter to the evidence before the agency, or offered one that is so implausible that it could not be ascribed to a difference in view or the product of agency expertise."

Source: SIERRA CLUB v. BOSWORTH. An Appeal to 9th Circuit from the United States District Court for the Eastern District of California, Filed December 5, 2007

<<http://caselaw.findlaw.com/us-9th-circuit/1175742.html>> <http://caselaw.findlaw.com/us-9th-circuit/1175742.html>

Request for changes to be made to the final NEPA document: Please specifically indicate in the decision document (DN or ROD) that the Responsible Official will not apply any herbicide formulation that contains the chemical glyphosate.

Supervisor Mullen, the press will become acquainted with what you are about to do. Articles describing how the USFS proposes to maim and ravage this public land will sell newspapers.

Unless you take action immediately, I plan to send hardcopies (and emails) of these comments to the Boise Statesman and submit letters to the editor asking the citizens to call you and ask questions about the poison you

might apply.

Please assure your draft NEPA document tells the public glyphosate-containing herbicides will not be used.

Please familiarize yourself with 18 U.S.C. [sect] 1001 quoted below:

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully -

(1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;

(2) makes any materially false, fictitious, or fraudulent statement or representation; or

(3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

(b) Subsection (a) does not apply to a party to a judicial proceeding, or that party's counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.

(c) With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to -

(1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or

(2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate. - See more at:
<<http://codes.lp.findlaw.com/uscode/18//47/1001#sthash.ChXNLypx.dpuf>>
<http://codes.lp.findlaw.com/uscode/18//47/1001#sthash.ChXNLypx.dpuf>

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<<http://caselaw.findlaw.com/us-9th-circuit/1175742.html>> <http://caselaw.findlaw.com/us-9th-circuit/1175742.html>

Here are several definitions of "manslaughter."

Merriam-Webster's Online Dictionary, 11th Edition: the crime of killing a person without intending to do so.

Oxford Dictionary: The crime of killing a

<http://www.oxforddictionaries.com/us/definition/american_english/human-being#human-being__3> human being without <http://www.oxforddictionaries.com/us/definition/american_english/malice-aforethought#malice-aforethought__2> malice aforethought, or otherwise in circumstances not <http://www.oxforddictionaries.com/us/definition/american_english/amount#amount__7> amounting to <http://www.oxforddictionaries.com/us/definition/american_english/murder#murder__2> murder.

Collins Dictionary: the unlawful killing of one human being by another without malice aforethought.

Final thought? There are alternatives to using Roundup

Sincerely,

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

Dick Artley (retired forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator --- Nez Perce National Forest)