Data Submitted (UTC 11): 2/16/2023 3:01:03 PM
First name: Michael
Last name: Bald
Organization:
Title:
Comments: Thank you for the opportunity to comment.

The reliance of this project on a 2010 Environmental Assessment is problematic. The 2010 Non-Native Invasive Plant Control Project Final Environmental Assessment is outdated, flawed in both data and assumptions, and egregiously misleading to the public.
My concerns are:

The document is out of date, in writing and in practice.
"The temporal scale of analysis is the next 10 years since that is the anticipated length of time for which a decision based on this analysis would be relevant." (p. 39) This point is repeated multiple times in the document, that looking beyond 10 years would be too speculative. If a 2010 document clearly loses relevance by 2020, then the duration of the Telephone Gap proposed project reaching beyond 2030 is of immense concern. Since invasive species impact many aspects of the Telephone Gap IRP (trails, road construction, timber harvests, recreation, riparian zones, habitat), resolution can only be achieved here with a new EA on invasive plant species management.

Page 5 of the EA declares "the pattern of travel-ways (including roads, trails, and rivers)... have favored the spread of Non-Native Invasive Plants within the varied habitats of the GMNF." Additionally, "the majority of NFS lands have not yet been surveyed. Of the 13 species with known infestations, habitats where they have been found include forests (primarily edges), wildlife openings, and riparian areas. They are especially common along roadsides and rivers." The assessment here is refreshing for its honesty, but it is troubling to read that "most forest interiors and most trails have not had surveys for NNIP. Total infested acres are likely to be at least two to three times higher than currently reported." The issue here is that a survey is a snapshot in time, and information becomes outdated almost as quickly as it is gathered. The information has meaning, but these infestations typically worsen over time and certainly do so in conditions of stress like drought and disturbance.
The Forest Service is traditionally underfunded and overstretched; it is completely unreasonable to expect the agency to operate at full or ideal capacity. It is equally unreasonable, therefore, to expose more of the forest to pest invasion. Such irresponsible actions run contrary to Forest Plan guidance and detract from forest health. If the situation was worrisome prior to 2010, it is beyond worrisome looking ahead toward 2030; timber harvests and roads and new trail systems will bring massive ecological consequences, while the economic negatives will be perhaps more subtle but equally negative.

The analysis of pesticide formulations is archaic and uninformed. If the government agencies continue to utilize SERA analyses of commercial pesticides, it is high time to acknowledge the shortcomings of such assessments. The documents themselves declare that adjuvants are not tested, studies are limited in number and in scope, and much data on human health is lacking, one report even notes: "this is a general issue in many Forest Service risk assessments." For example, what is the joint action of imazapyr with adjuvants? Regarding aminopyralid, because it is "a new herbicide, no information is available in the published literature on the toxicity of aminopyralid to humans or other mammalian species. No surface water monitoring data are available on aminopyralid that could be used to assess the plausibility of the modeling discussed in previous subsections. This is a limitation in this risk assessment and a source of uncertainty." If this is the state of things in 2004 and 2007, an update is desperately needed. It is common knowledge that agrichemical companies prefer and embrace a three month timeframe for toxicity studies on mammals, but there has been plenty of time for them to complete longer trials. Three months is not nearly enough time with laboratory studies to determine reproductive, endocrine, or immune system impacts. What have we learned since 2001, 2003, 2007? Again, it is time to erase the convenient clouds of uncertainty. Perhaps the Forest Service would even embrace a Precautionary Principle

to guide its management programs because lack of data on human health impacts is alarming.

In addition to the lack of data and incomplete studies, a newly confirmed hazard with pesticides is the presence of PFAS / PFOA compounds. Forever chemicals need to be addressed, particularly as water resources in the state are increasingly imperiled. PFAS and PFOA are not addressed in the 2010 document; only POEA is acknowledged. The Forest Service dismissed that concern, however, out of respect for the proprietary status awarded to additives in pesticide formulations. One must truly wonder: at which point does the sheer number of secret additives and their harmful, chronic, perhaps cumulative effects begin to outweigh the support for corporate profiteering? When does a government agency charged with the notion of Service draw the line?

The cost comparison of treatment methodologies is truly disingenuous; information is presented in standard print, but a slew of footnotes then subtracts all meaning from the very same information. Chemical treatment approaches are costly, but apparently not for the US Forest Service, since the cost summary does not include "chemical surfactants / adjuvants, project preparation, purchase of equipment or project administration…" I suppose we should assume the cost also omits the warning signs and clean-up procedures. This is beyond misleading; I see it as intentionally deceptive to somehow justify a flawed, injurious approach. It is equally ludicrous to see in the very same chart that manual / mechanical approaches for invasive species cost $10,000 per acre. With that kind of false comparison, who among us would NOT choose to just spray and walk away at a cost of $42 - $318 / acre? These falsehoods need immediate correction, and I speak here as a professional in the field. Never has any client of mine paid anything remotely close to $10,000 per acre for manual / mechanical control of non-native invasive plants.

Finally, the use of pesticides as a treatment option for invasive species or bothersome native species works against community, state, and federal efforts to reduce CO2 emissions. The application of pesticide products must factor in a five-fold CO2 impact that should count against the overall annual agency footprint. Energy goes into pesticide production and transport and application; there is always an environmental cost to those actions. I should also point out that while manufacturers highlight rapid breakdown of their products and neutralization in the soil, some of the final breakdown products include formaldehyde and CO2.
That should be a concern, no?