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Comments: Greetings,

I see that you modified the Tarleton IRP environmental assessment and DN / FONSI; some of the adjustments were positive and reasonable.

I must continue to object to the proposed project, however, based on several concerns that you have failed to address.

In short, you have chosen to ignore:

1. New EPA guidance on PFAS compounds present in pesticides and the five-fold CO2 footprint associated with pesticide usage. Information on the EPA's PFAS Strategic Roadmap was published on 29 March, 2023: <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>
2. The need to update the grossly outdated 2007 WMNF Environmental Assessment (WMNF Forest-wide Invasive Plant Control Project).
3. The need to buffer the larger forest from two transmission vectors that are funneling invasive species directly toward the proposed harvest area.

The problem here is one of flow. As it stands now, the Tarleton project will open and expose hundreds of acres of forest on the western edge of the White Mountains. This action, combined with ever-increasing pressure from recreation interests, will accelerate the invasion by herbaceous exotic plants (Japanese stiltgrass being worst among them) and non-native earthworms. Your under-resourced staff will then struggle to keep up with these infestations, and you will propose a chemical treatment program when things are "too far gone" or "out of control". This will create annual PFAS exposures on top of the legacy PFAS already in place. The EPA has declared that there is no safe level for PFAS in drinking water, so the risk to water bodies must be absolutely avoided, without exception. This decision to use PFAS-containing pesticides is an alarming precedent subjecting entire communities to potential long-term harm.

Finally, all the proposed herbicide activity is inconsistent with solutions to global warming, since pesticides bring with them a five-fold CO2 footprint. The one single issue you condensed the 2005 / 2006 public comments into was direct and simple: The Forest should not use Pesticides. Yet almost twenty years later, nothing has changed. You ignored the summary public comment from nineteen individuals, you avoided addressing the concerns those individuals expressed, and you propose to continue in that vein now. Regardless of how much discussion took place in 2006, your staff chose to override public concerns; your Decision Notice even declares that the herbicides utilized "will not harm humans or the environment." (p.4) That is a declaration of fact when the only fact is that effects and impacts are not yet fully understood. Data is incomplete, and there have always been strong elements of uncertainty, as noted in virtually all herbicide safety assessment documents.

The science of pesticides and their cumulative and chronic effects has evolved since 2006. I tried to advise you of this problem in my comments one year ago, yet there is no acknowledgement that a new Environmental Assessment is warranted. The EA and the Decision Notice for the Forest-wide Invasive Plant Control Project both clearly refer to a ten year timeline. It is now approaching ten years beyond the time for revision. How long will you allow this antiquated, misleading document to serve as a planning reference? PFAS contamination alone should justify the need for updating.

Your 2007 EA and Decision Notice declared that Japanese stiltgrass would likely be approaching the White Mountain National Forest in 10-20 years. This is in fact true; with confirmed sightings moving northward up the Connecticut River valley from locations in Massachusetts. Does Forest staff know how close Japanese stiltgrass is? Asiatic bittersweet is equally problematic and also close at hand. Your outreach included the town of Piermont, NH, but not Orford or Lyme. Did anyone share invasive plant data with you from these nearby valley

towns? Has your staff reached out to scientists with regard to invasive earthworms? I am told by an academic expert in the field that Forest Service personnel have not reached out to him.

This sounds like serious trouble. The Forest Service will cut sections of the national forest along major roadways and powerline transmission corridors; the conditions will be more favorable to deer and birds; these animals and the machinery of logging and recreation will spread seed into the harvested areas; and infestations will gain new footholds and startpoints. Sadly, community members on adjacent lands will likely see their forested landscapes decimated by the invasions accelerated by the actions of the Forest Service.

So in conclusion, the waters of Lake Tarleton will absorb yet more PFAS and more silt, while the harvested lands will struggle to regenerate, and the intact forest will experience new plant and earthworm species on its immediate flank. Not good, not a good scenario.

This proposed Decision on the Tarleton IRP is flawed and contradicts points 4, 5, and 6 from the Finding of No Significant Impact section, page 24 of the Final Environmental Assessment. If the Council on Environmental Quality's requirements call for attention to "highly controversial" issues, "unknown risks", and "the establishment of precedence" then this project cannot proceed as currently outlined. The issue of PFAS carries both knowns and unknowns as well as controversy over remediation programs and associated costs. PFAS compounds in pesticides and numerous other products are causing real physical health issues as well as mental and emotional stress. What else would we expect when water contamination is at stake? As research continues, we see how much we still don't know, so the risks are truly uncertain, unique, and poorly understood. Finally, in light of the PFAS risk and the global warming impact, the choice in 2007 to continue with pesticide programs, followed by this decision in 2023 to perpetuate the practice, is truly an alarming precedent. Human health in the eyes of the agency is clearly secondary to resource extraction and short-term profit. If the Tarleton IRP decision goes forward, the future will be more bleak than ever.

Thank you for taking my comments and my objection, you have been admirably receptive to input. I get nothing from making this objection; it is simply what I must do.