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Comments: This is a response in concern to the Forest Service asking for "Preliminary public feedback on invasive weed management options" in the Siuslaw Integrated Invasive Species Project. Included in the options is the use of herbicides, disturbing evidence of the Forest Service reverting to thoroughly discredited unlawful behavior banned by the federal courts forty years ago:

Save Our Ecosystems v. Clark:Nos. 83-3908 et al. (9th Cir. January 27, 1984):

9. More and more chemicals are added to our environment daily without adequate information about the long-range effects on health and environment. The EPA, in effect, acknowledges that data on the herbicides in this case are inadequate since the registration is conditional under an exception to the normal registration process. See 7 U.S.C. § 136a(c)(7).

13. EPA's data is partial at best, and suspect at worst, because of the testing scandals. The availability of the data of the chemical companies is also in question. See Monsanto Co. v. EPA, 564 F. Supp. 552 (E.D.Mo.1983), probable jurisdiction noted, U.S. , 104 S. Ct. 230, 78 L. Ed. 2d 224 (1983). Monsanto is opposing the disclosure of EPA health and safety data before the Supreme Court while it argues here that the Forest Service may rely on that data. These two positions appear irreconcilable. Any data relied upon in an EIS must be made available to the public. See California v. Block, 690 F.2d 753, 765 (9th Cir.1982); 40 C.F.R. § 1502.21.

As the Forest Service has little or no independently sourced information on any of its proposed poisons and relies on EPA registration, the Forest Service must at the very least include in its NEPA and NFMA documents the following information :

-- The current EPA registration status of each product with particular emphasis on conditional registration;

-- For any chemical that is conditionally registered, the Forest Service must identify what testing or other data are missing from the registration.

-- Copies of or links to any and all peer-reviewed, independently funded and conducted toxicity, persistence, and environmental studies conducted by or for the U.S. Forest Service of each proposed product, its metabolites and break-down products, its inert ingredients, AND especially any and all toxicity studies of any combination of two or more proposed products;

-- Copies of or links to any and all peer-reviewed toxicity, persistence, and environmental studies conducted by nonindustry-funded research of each proposed product, its metabolites and breakdown products, its inert ingredients, AND especially any and all toxicity studies of the combination of two or more proposed products.

-- Copies of or links to any and all peer-reviewed toxicity, persistence, and environmental studies conducted by anyone anywhere of the combination of two or more proposed products; for example:

<https://medicalxpress.com/news/2024-07-cancer-pesticides-cases.html>

- Copies of or links to any studies, analyses, or reference to the presence of any PFAS "forever chemicals" in any active or inert ingredient of any of the proposed products, an important need as PFAS have been found in more than 60 percent of registered pesticides, see

<https://www.theguardian.com/environment/article/2024/jul/23/pfas-pesticides-epa-research>

"We present a list of major pesticide contributors for some specific cancers, but we highlight strongly that it is the combination of all of them and not just a single one that matters,"

See also: <https://boerenlandvogels.nl/sites/default/files/Final%20version%20of%20TAP%20review.pdf>,
Pesticides and human chronic diseases: Evidences, mechanisms, and perspectives

- Detailed contour maps and explanations for each projected spray site showing all surface and groundwater sources within or down-slope from the site.
- Proposed detailed plans for after-spray monitoring soil and both surface and groundwater for contaminants of the proposed products used, and the time frame for such monitoring;
- Any and all data on each endangered or threatened species of mammal, amphibian, reptile, fish, bird, plant, insect, or other organism within a mile of the proposed spraying;
- Site-specific history of any previous application[s] of herbicides on each target site by the Forest Service or any other entity in the past 60 years, and current testing for residues, PFAS, and dioxins on any previously sprayed site;
- Detailed information about all aspects of a drone application for each proposed site, including but not limited to those described in <https://www.farmprogress.com/technology/what-to-know-before-making-a-spray-drone-pesticide-application>, with particular attention to the need for safety precautions and procedures for possible crashes or dumping of herbicide.

If the Forest Service is unable or unwilling to provide all of the above information, no chemical poisons should be proposed or used for this project.

The Forest Service should withdraw herbicides from its list of options for controlling invasive species if it cannot provide the information listed above, as well as provide detailed plans and procedures for ensuring no contamination of surface or groundwater, no contamination of endangered, threatened, or non-target species, and no damage to non-target plants will occur.

Anything less is a direct health and safety threat to the people, animals, and environment in said areas and is completely unacceptable ethically.