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First name: Michelle

Last name: Perro

Organization: GMOScience

Title: CEO

Comments: To: Manti-La Sal National Forest, Responsible Project Official

Re: Manti-La Sal National Forest Vegetation Resiliency Project - Opposition to Pesticide Application

Date: August 4, 2026

I am writing to express my complete and unequivocal opposition to the proposed "Vegetation Resiliency Project" as it pertains to any application of pesticides, herbicides, or chemical treatments on the Manti-La Sal National Forest.

Emergency Authority Abuse

First, I object to the procedural framework itself. The use of Section 40807 of the Infrastructure Investment and Jobs Act to bypass standard NEPA processes including the pre-decisional objection process under 36 CFR Part 218 is a transparent end-run around public accountability. Secretary's Memorandum 1078-006 designating 112 million acres as an "emergency situation" is not a genuine emergency declaration; it is a blanket administrative workaround designed to silence public opposition. An emergency that covers nearly 60% of all National Forest System lands is not an emergency; it is a pretense.

Pesticide Concerns

My substantive objections to any pesticide or herbicide use in this project:

1. **Non-Target Species Harm.** Broadcast chemical application does not discriminate between target vegetation and ecologically essential native plants. Pollinator populations already under severe stress face direct mortality and sublethal impairment from herbicide exposure. Soil microbiomes, mycorrhizal networks, and the entire below-ground ecosystem upon which forest health depends are devastated by these chemicals, with recovery timelines measured in decades, not seasons.
2. **Water Contamination.** The Manti-La Sal provides watershed services to surrounding communities. Pesticides and herbicides inevitably migrate through soil into groundwater and surface water. No buffer zone is adequate when dealing with the hydrological realities of mountainous terrain. Downstream users such as human, agricultural, and wildlife bear the burden of this contamination without consent.
3. **Chronic Health Effects.** The cumulative and synergistic effects of chronic low-level exposure to these chemicals are systematically understudied and underreported. Endocrine disruption, neurological effects, and carcinogenicity are well-documented concerns with many common forestry herbicides. Applying them at landscape scale multiplies exposure pathways for workers, recreational users, and neighboring communities.
4. **Fire Ecology Misunderstanding.** The premise that chemically suppressing native vegetation reduces fire risk fundamentally misunderstands fire ecology. Many Western forest ecosystems evolved with fire as a regenerative process. The "uncharacteristic wildfire" framing is often used to justify intervention in systems that would benefit from natural fire regimes. Chemical "treatment" creates a cycle of dependency; kill the understory, then claim the resulting monoculture or invasive recolonization requires further chemical intervention.
5. **Precautionary Principle.** The burden of proof should rest on the agency to demonstrate that these chemicals are safe at landscape scale across all exposure pathways and time horizons and not on the public to prove harm after the fact. That burden has not been met.

Alternative Approach

If genuine fire risk reduction is the goal, I support:

Mechanical thinning where absolutely necessary, conducted with minimal soil disturbance

Restoration of natural fire regimes through managed wildfire where appropriate

Protection and expansion of natural fire breaks

Community-level defensible space programs that address the wildland-urban interface directly, rather than treating remote forest landscapes with chemicals

Standing and Participation

I am submitting these comments within the designated comment period and providing my contact information below to preserve my eligibility for any administrative review process that may apply. I request that my comments be included in the full project record.