

Data Submitted (UTC 11): 10/5/2018 2:34:42 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: October 4, 2018

Dear Ranger Ruppel and selected IDT members,

"When the last tree is cut down, the last fish eaten, and the last stream poisoned, you will realize that you cannot eat money"

Cree Indian Proverb, about 1885

Please accept and consider these comments on the proposed Chiricahua FireScape timber sale pre-decisional EA

Ranger Ruppel your draft EA indicates you plan to apply a herbicide that contains the chemical glyphosate for to kill noxious weeds. The spread of noxious weeds is a threat to our national forests, however if you apply this carcinogen where children might play you will be taking action that might kill them later in life. Roundup is poison.

Even casual exposure to Roundup has been known to cause cancer (non-Hodgkin Lymphoma), DNA damage, autism, irreparable kidney and liver damage, infertility, learning disabilities, ADHD and other neurological disorders (especially in children), mitochondrial damage, cell asphyxia, endocrine disruption, bipolar disorder, skin tumors, thyroid damage, decrease in the sperm count, chromosomal damage and birth defects.

If glyphosate is safe why would herbicides that contain the chemical be banned Denmark, England, Italy, El Salvador, Sri Lanka, France, Holland, Austria, Bulgaria, Germany, Greece, Hungary, Ireland, Japan, Chile, South Africa, Luxembourg, Madeira, Cameroon, New Zealand, Peru, South Australia, Russia, France, Switzerland, Columbia, and Costa Rica? This link describes this on more detail:

<https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/where-is-glyphosate-banned/>

These comments constitute notification and will be on file if needed in court.

A person is guilty of reckless endangerment who knowingly creates a substantial risk of death or serious physical injury to another person. Reckless endangerment is a felony. Are you a risk taker?

You indicate you will apply herbicides to control NNIS. At page 50 you say:

"Only herbicides labeled for aquatic use (i.e. Rodeo (glyphosate) Renovate (triclopyr) and Weedar 64 (2,4-D amine) will be used within 30 feet of streams and other bodies of water. "

The Court has Spoken - Glyphosate causes Cancer

On July 2018, Dewayne Johnson (a former school groundskeeper) who was diagnosed with non-Hodgkin's

lymphoma. He sued Monsanto alleging the chemical glyphosate (an ingredient in Roundup).caused his cancer. Mr. Johnson used Roundup as part of his job. On August 10, 2018 a jury in San Francisco delivered a verdict in Mr. Johnson's favor. The judge ordered Monsanto to pay Mr. Johnson \$289 million in total damages

Unless your final EA states herbicides containing glyphosate will not be applied its likely you will be the defendant.

Here are a few of the many links to the verdict:

4 Must-See Videos of the Huge Win in the Monsanto Trial
<https://www.organicconsumers.org/blog/monsanto-trial-verdict-videos>

San Francisco Jurors Hear Hours of Scientific Data About Herbicide's Link to Cancer
<https://www.law.com/therecorder/2018/07/09/san-francisco-jurors-hear-hours-of-scientific-data-about-herbicides-link-to-cancer/?slreturn=20180713081135>

Monsanto Loses Landmark Roundup Cancer Trial, Set to Pay USD 289 Million in Damages
<https://mail.google.com/mail/u/0/#inbox/FMfcgvxBXtJCGsfZgnVKVKfStZmxqSM>

Monsanto "Taken To The Cleaners" In Jury Verdict Dwayne Johnson v. Monsanto
<https://www.activistpost.com/2018/08/monsanto-taken-to-the-cleaners-in-jury-verdict-dwayne-johnson-v-monsanto.html>

Jury rules Monsanto liable in weed killer case
<https://abc7news.com/society/verdict-reached-in-lawsuit-against-monsanto/3925454/>

Monsanto ordered to pay \$289 million in world's first Roundup cancer trial
<https://www.reuters.com/article/us-monsanto-cancer-lawsuit/jury-orders-monsanto-to-pay-290-million-in-california-roundup-cancer-trial-idUSKBN1KV2HB>

Monsanto Loses \$289 Million Verdict in Roundup Cancer Trial
<https://www.bloomberg.com/news/articles/2018-08-10/monsanto-s-roundup-caused-groundskeeper-s-cancer-jury-finds>

Jury orders Monsanto to pay nearly \$290M in Roundup trial
<https://www.nbcnews.com/news/us-news/jury-orders-monsanto-pay-290m-roundup-trial-n899811>

There is a reason the USFS continues to remain silent about glyphosate toxicity and allows line-officers to apply it. The USDA has been in bed cuddling with the herbicide and pesticide manufacturers for decades. No intelligent person would reject the information below our of hand.

Obama's Highly Corrupt USDA: END Monsanto.
<http://www.thomhartmann.com/users/telliottmbamsc/blog/2013/10/obamas-highly-corrupt-usda-end-monsanto>

A Government of Monsanto, by Monsanto, and for Monsanto
<http://farmwars.info/?p=5860>

USDA to Give Monsanto's New GMO Crops Special 'Speed Approval'
https://www.blacklistednews.com/USDA_to_Give_Monsanto%E2%80%99s_New_GMO_Crops_Special_%E2%80%98Speed_Approval%E2%80%99_/18106/0/0/0/Y/M.html

Another Monsanto man in a key USDA post? Obama's ag policy's giving me whiplash
<http://grist.org/article/2009-09-24-usda-obama-monsanto-organic/>

GMO Science Deniers: Monsanto and the USDA
<http://www.wanttoknow.info/a-gmo-science-deniers-monsanto-the-usda>

USDA Forces 'Whole Foods' To Accept Monsanto
<http://humansarefree.com/2012/02/usda-forces-whole-foods-to-accept.html>

Is the USDA Covering Up Potential Dangers That Affect Your Health?
<http://www.liveinthenow.com/article/is-the-usda-covering-up-dangers-that-affect-your-health>

USDA and Monsanto "Biotech" Industry Collusion
<http://www.truthwiki.org/usda-and-monsanto-biotech-industry-collusion/>

Corruption at the USDA
<https://newhomeeconomics.wordpress.com/2010/03/09/corruption-at-the-usda/>

USDA Admits Exterminating Birds, Crops, and Bees
<http://worldtruth.tv/usda-admits-exterminating-birds-crops-and-bees/>

USDA: Stop Killing Bees and Butterflies (CCD) While Saving Monsanto (Round-Up)
<https://www.change.org/p/usda-stop-killing-bees-and-butterflies-ccd-while-saving-monsanto-round-up>

Are you aware that the USDA is attempting to corrupt organic standards?
http://www.carbonproduct.net/Health_and_Fitness/Are_you_aware_that_the_USDA_is_attempting_to_corrupt_organic_standards/_17096

NEW SCANDAL FOR USDA & MONSANTO: Whistle Blowers at USDA say MONSANTO Influences Agency Suppression of Critical Science.
<http://mauicauses.org/new-scandal-for-usda-monsanto-whistle-blowers-at-usda-say-monsanto-influences-agency-suppression-of-critical-science/>

USDA moves to let Monsanto perform its own environmental impact studies on GMOs
http://axisoflogic.com/artman/publish/Article_62860.shtml

Monsanto's GMO Crops Ravage US, USDA Ignores Dangers
<http://www.alipac.us/f19/monsanto%92s-gmo-crops-ravage-us-usda-ignores-dangers-247146-print/>

THE BITTER TRUTH ABOUT THE USDA AND MONSANTO SUGAR BEETS
<http://geneticallyengineeredfoodnews.com/monsanto-sugar-beets>

USDA Approves Toxic Herbicide Amidst Great Public Outcry
<http://healthimpactnews.com/2014/usda-approves-toxic-herbicide-amidst-great-public-outcry/>

USDA Gives Green Light to 2,4-D Resistant GM Crops
<http://sustainablepulse.com/2014/01/03/usda-gives-green-light-pesticide-promoting-gm-crops/#.VIIUtJbTm1s>

USDA refuses to test foods for glyphosate contamination, says pesticides are safe to eat.
http://www.naturalnews.com/048237_glyphosate_contamination_USDA.html

USDA Secretary Vilsack's proposal for product labeling: companies will voluntarily, use barcodes to tell consumers if their products contain GMOs. This would require you to scan the product, then be directed to the company's website where you'd have to wade through the advertising and search the fine print.
<https://www.organicconsumers.org/essays/%E2%80%98%E2%80%99-barcodes-latest-plot-keep-you-dark-about-gmos>

Herbicide Use To Increase Dramatically
<http://www.enn.com/agriculture/article/47711>

USDA Approval of Second-Generation of GMOs
<http://undergroundhealthreporter.com/usda-approval-of-second-generation-of-gmos/#axzz3sFaNPdRd>

US Department of Monsanto (a.k.a. USDA)
<http://www.anh-usa.org/us-department-of-monsanto-a-k-a-usda/>

USDA Drops Plan To Test For Monsanto Weed Killer In Food
https://www.huffingtonpost.com/entry/usda-drops-plan-to-test-for-monsanto-weed-killer-in_us_58d2db4ee4b062043ad4af84

USDA okays Monsanto's herbicide-resistant GMO corn w/o permits
<https://www.rt.com/usa/337088-usda-deregulates-monsanto-corn/>

The FDA and USDA have become the legislative and executive branches of Monsanto, Dow, Bayer and the likes.
<http://peopleforethicaliving.com/fda-usda-monsanto-pharma-gmo/>

USDA Censoring Anti-Monsanto Science?
<https://www.foodandwaterwatch.org/news/usda-censoring-anti-monsanto-science-0>

USDA betrays American people, approves Monsanto's new GMOs
https://www.naturalnews.com/048751_GMOs_USDA_Monsanto.html

Six Reasons Why Obama Appointing Monsanto's Buddy, Former Iowa Governor Vilsack, for USDA Head Would be a Terrible Idea
<https://www.organicconsumers.org/news/six-reasons-why-obama-appointing-monsantos-buddy-former-iowa-governor-vilsack-usda-head-would>

Another Monsanto man in a key USDA post? Obama's ag policy's giving me whiplash
<https://grist.org/article/2009-09-24-usda-obama-monsanto-organic/>

Tell the Senate: Don't Let Monsanto Run the USDA and EPA!
https://action.organicconsumers.org/o/50865/p/dia/action3/common/public/?action_KEY=19679

Trump's top pick for USDA chief is a friend of Monsanto
<https://dcinfowarrior.wordpress.com/2016/12/02/trumps-top-pick-for-usda-chief-is-a-friend-of-monsanto-sambrownback/>

Sonny Perdue: In the Pocket of Big Ag
<https://medium.com/center-for-biological-diversity/sonny-perdue-in-the-pocket-of-big-ag-b127043dfea5>

5 Reasons Why Food Experts Are Worried About Trump's New Agriculture Secretary
<http://www.grubstreet.com/2017/01/5-reasons-experts-worry-about-trumps-agriculture-secretary.html>

Trump Makes His Pick for Agricultural Secretary - And It Looks Like Good News for Big Ag (and Monsanto For That Matter)
<https://www.march-against-monsanto.com/tag/monsanto-sonny-perdue/>

Please Sign: Dump Trump's Monsanto Man! NoPerdue! No SwampCabinet!
https://action.organicconsumers.org/content_item/o-ca-email?email_blast_KEY=1365277

Trump Meets With Leaders From Monsanto, Bayer
<https://www.chem.info/news/2017/01/trump-meets-leaders-monsanto-bayer>

Comment: Ranger Ruppel, I ask you and your IDT members to have the courage to read the science conclusions of independent scientists not affiliated with the USFS in the Glyphosate kills attachment. Ask yourself why the USFS claims glyphosate is safe and best science clearly shows it's a toxic poison.

The Public Reads about the Dangers of Glyphosate
Quite Often and Still you Propose
to Apply this Poison. Here's what the
Public is Reading that you Ignore.

Article Title: Glyphosate Linked to Bee Deaths in Shocking New University of Texas Study

Excerpts:

"The world's most widely used weedkiller glyphosate may also be indirectly killing bees. New research from The University of Texas at Austin shows that honey bees exposed to glyphosate, the active ingredient in Roundup, lose some of the beneficial bacteria in their guts and are more susceptible to infection and death from harmful bacteria.

Scientists believe this is evidence that glyphosate might be contributing to the decline of honey bees and native bees around the world."

Published online by Sustainable Pulse, September 24, 2018

Link to article: https://sustainablepulse.com/2018/09/24/glyphosate-linked-to-bee-deaths-in-shocking-new-university-of-texas-study/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-09-27#.W61deXtKi1s

Article Title: Bayer Slashes Earnings Forecast over Rise in Roundup Cancer Cases

Excerpts:

"Bayer has slashed its earnings forecast Wednesday due to, amongst other things, a growing global legal battle surrounding the carcinogenic weedkiller Roundup."

"Bayer said the number of plaintiffs seeking damages over Monsanto's Roundup and Ranger Pro herbicides had risen to 8,700 from 8,000 from last month, and said that it expected more to sue. It has vowed to defend itself in court.

The German company's newly acquired Monsanto subsidiary was left in shock in August after they lost a landmark cancer trial in San Francisco and was ordered by the Judge to pay over USD 289 Million in total damages to the former school groundskeeper Dewayne Johnson, a California father who has non-Hodgkin's lymphoma, which was caused by Monsanto's glyphosate-based weedkiller Roundup."

Published online by Sustainable Pulse, September 5, 2018

Link to article: https://sustainablepulse.com/2018/09/06/bayer-slashes-earnings-forecast-over-rise-in-roundup-cancer-cases/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-09-06#.W5FU385Ki1s

Article Title: Secret Documents Expose Monsanto's War on Cancer Scientists

Excerpts:

"Monsanto was its own ghostwriter for some safety reviews," Bloomberg reported, and an EPA official reportedly helped Monsanto "kill" another agency's cancer study. An investigation in Le Monde details Monsanto's effort "to destroy the United Nations' cancer agency by any means possible" to save glyphosate.

Two recent journal articles, based on reviews of the Roundup trial discovery documents, report corporate interference in a scientific publication and a federal regulatory agency, and other examples of "poisoning the scientific well." "

Published by Truthout, July 16, 2018

Link to article: <https://truthout.org/articles/secret-documents-expose-monsantos-war-on-cancer-scientists/>

Article Title: First trial over Roundup weed killer cancer claim underway

Excerpts:

"Lawyers for a school groundskeeper dying of cancer asked a San Francisco jury on Monday to find that agribusiness giant Monsanto's widely used weed killer Roundup likely caused his disease.

Dewayne Johnson's lawsuit is the first case to go to trial among hundreds of lawsuits saying Roundup caused non-Hodgkin's lymphoma.

Johnson sprayed Roundup and a similar product, Ranger Pro, at his job as a pest control manager at a San Francisco Bay Area school district, according to his attorneys."

Published by the AP, July 10, 2018

Link to article: <https://apnews.com/a5ca3614e37b435894665cc2ec493e83/First-trial-over-Roundup-weed-killer-cancer-claim-under-way>

Article Title: We Owe It to This Brave, Determined Victim.

Excerpts:

"Early this week, a California court appointed the judge who will oversee the trial of DeWayne Johnson v. Monsanto Company.

DeWayne "Lee" Johnson was a school groundskeeper, a job that required him to use Monsanto's Roundup weedkiller on school properties.

The 46-year-old father of two is now terminally ill, with Non-Hodgkin lymphoma (NHL). And he's suing Monsanto."

Published by Organic Consumers Association, June 21, 2018

Link to article:

<https://www.organicconsumers.org/blog/we-owe-it-brave-determined-victim#close>

Article Title: Monsanto Relied on These 'Partners' to Attack Top Cancer Scientists

Excerpts:

"The Monsanto plan names more than a dozen "industry partner" groups that company executives planned to "inform / inoculate / engage" in their efforts to protect the reputation of Roundup, prevent the "unfounded" cancer claims from becoming popular opinion, and "provide cover for regulatory agencies." Partners included academics as well as chemical and food industry front groups, trade groups and lobby groups - follow the links below to fact sheets that provide more information about the partner groups.

Together these fact sheets provide a sense of the depth and breadth of the corporate attack on the IARC cancer experts in defense of Monsanto's top-selling herbicide."

Published by the Sustainable Pulse, June 4, 2018

Link to article:

https://sustainablepulse.com/2018/06/04/monsanto-relied-on-these-partners-to-attack-top-cancer-scientists/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-06-16#.WyUmqVVKi1s

Article Title: Landmark Lawsuit Claims Monsanto Hid Cancer Danger of Weedkiller for Decades

Excerpts:

"At the age of 46, DeWayne Johnson is not ready to die. But with cancer spread through most of his body,

doctors say he probably has just months to live. Now Johnson, a husband and father of three in California, hopes to survive long enough to make Monsanto take the blame for his fate.

On 18 June, Johnson will become the first person to take the global seed and chemical company to trial on allegations that it has spent decades hiding the cancer-causing dangers of its popular Roundup herbicide products - and his case has just received a major boost.

Last week Judge Curtis Karnow issued an order clearing the way for jurors to consider not just scientific evidence related to what caused Johnson's cancer, but allegations that Monsanto suppressed evidence of the risks of its weed killing products. Karnow ruled that the trial will proceed and a jury would be allowed to consider possible punitive damages."

Published by the Guardian newspaper, May 21, 2018

Link to article:

<https://www.organicconsumers.org/news/landmark-lawsuit-claims-monsanto-hid-cancer-danger-weedkiller-decades>

Article Title: New Study: EPA's 'Safe' Levels of this Chemical in Your Food Aren't So Safe After All

Excerpts:

"Now a new pilot study, soon to be published in the prestigious scientific journal Environmental Health, suggests that EPA "safe" levels aren't safe at all-especially for kids.

The Global Glyphosate Study pilot experimental phase, the first study of its kind, suggests that exposure to glyphosate at levels the EPA wants us to believe are "safe" can in fact lead to "certain important biological parameters, mainly relating to sexual development, genotoxicity and the alteration of the intestinal microbiome."

We were especially intrigued by the study's mention of how glyphosate alters the intestinal microbiome. OCA, along with Beyond Pesticides, is involved in a lawsuit against Monsanto for falsely for misleading consumers who buy Roundup for their lawns about the product's safety. Monsanto tried to get the lawsuit dismissed, but a federal judge recently ruled in favor of allowing the lawsuit to proceed."

Published by the Organic Consumers Assn., May 17, 2018

Link to article:

<https://www.organicconsumers.org/blog/new-study-epas-safe-levels-chemical-your-food-arent-so-safe-after-all>

Article Title: Weedkiller products more toxic than their active ingredient, tests show

Excerpts:

"According to a Guardian story published just today, government researchers in the US have found evidence that "some popular weedkilling products, like Monsanto's widely-used Roundup, are potentially more toxic to human cells than their active ingredient is by itself." "

"Even though Monsanto introduced glyphosate-based Roundup in 1974 and even though doctors and scientists have had issues with it for years, only now, after more than 40 years of widespread use, is the government investigating the toxicity of "glyphosate-based herbicides"1 on human cells."

Published in The Guardian, May 8, 2018

Link to article:

<https://www.healthnutnews.com/breaking-the-guardian-weedkiller-products-more-toxic-than-their-active-ingredient-tests-show/>

Article Title: Weedkiller found in granola and crackers, internal FDA emails show

Excerpts:

"The Food and Drug Administration (FDA) has been testing food samples for residues of glyphosate, the active ingredient in hundreds of widely used herbicide products, for two years, but has not yet released any official results.

But the internal documents obtained by the Guardian show the FDA has had trouble finding any food that does not carry traces of the pesticide.

"I have brought wheat crackers, granola cereal and corn meal from home and there's a fair amount in all of them," FDA chemist Richard Thompson wrote to colleagues in an email last year regarding glyphosate. Thompson, who is based in an FDA regional laboratory in Arkansas, wrote that broccoli was the only food he had "on hand" that he found to be glyphosate-free."

Published by The Guardian, April 30, 2018

Link to article:

<https://www.theguardian.com/us-news/2018/apr/30/fda-weedkiller-glyphosate-in-food-internal-emails>

Article Title: Germany Will Phase Out Glyphosate Herbicides "As Fast As Possible"

Excerpts:

"The new German government will aim to end the use of glyphosate herbicides "as fast as possible", according to the draft deal to establish a new German coalition government published on Wednesday on the homepage of Chancellor Angela Merkel's CDU party.

The draft states; "We will with a systematic minimalisation strategy significantly restrict use of plant protection chemicals containing glyphosate, with the goal of fundamentally ending usage as fast as possible.

"We will develop alternatives jointly with the agricultural sector as part of an arable farming strategy which will regulate environmentally friendly and nature-compatible use of plant protection chemicals." "

Published by Sustainable Pulse, April 28, 2018

Link to article:

<https://sustainablepulse.com/2018/02/09/germany-will-phase-out-glyphosate-herbicides-as-fast-as-possible/#.WuPs7Kvn-1s>

Article Title: Popular Beer and Wine Brands Contaminated With Monsanto's Weedkiller, Tests Reveal

Excerpts:

"Over 1,000 plaintiffs, most of them farmers, have filed lawsuits against Monsanto, a leading manufacturer of glyphosate, for Roundup exposure leading to non-Hodgkin Lymphoma."

Published by Alternet Food, March 27, 2018

Link to article:

<https://www.alternet.org/food/popular-beer-and-wine-brands-contaminated-monsantos-weedkiller-tests-reveal?akid=16875.303761.VhNxb1&rd=1&src=newsletter1090311&t=37>

Article Title: Monsanto's Toxic Legacy: An Investigative Reporter Talks Glyphosate

Excerpts:

"Editor's Note: In the following interview, for Acres U.S.A., Tracy Frisch interviews Carey Gillam about her first book: Whitewash: The Story of a Weed Killer, Cancer, and the Corruption of Science."

"As I've stressed, glyphosate is the most widely used herbicide in history, but it's the only pesticide that neither the USDA nor the FDA have tested for."

"On top of that, didn't the federal government bump the maximum residue level for glyphosate up many times higher than it used to be?

Yes. Over the years, the legal limits for residues of glyphosate have been raised many times, for many different foods and feed crops."

Published by In these Times, March 23, 2018

Link to article: <https://www.alternet.org/environment/glyphosate-monsantos-toxic-legacy?akid=16860.303761.X2S1xb&rd=1&src=newsletter1090183&t=27>

Article Title: Monsanto in Epic Fail with Attempted Attack on Global Glyphosate Study

Excerpts:

"The results of the short-term pilot study showed that glyphosate-based herbicides (GBHs) were able to alter certain important biological parameters in rats, mainly relating to sexual development, genotoxicity and the alteration of the intestinal microbiome, at the 'safe' level of 1.75 mg/kg/day set by the U.S. Environmental Protection Agency (EPA).

As is normal practice for Monsanto, their Public Relations department was soon in action to try and crush the scientists involved and the study results, which could cause major damage to the product that supports their whole business model - the glyphosate-based herbicide Roundup.

However, this time their PR campaign against the Study was only met with contempt and disdain from journalists, politicians, scientists and the public in countries across Europe."

Published by Sustainable Pulse, May 22, 2018

Link to article:

https://sustainablepulse.com/2018/05/22/monsanto-in-epic-fail-with-attempted-attack-on-global-glyphosate-study/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-05-28#.Wwv3HO4vy1s

Article Title: Link between Monsanto's Roundup weed killer and cancer 'cannot be ignored'

Excerpts:

"Last week eight scientists told two California judges that the evidence points them in one direction: Exposure to Monsanto's Roundup weed killer can cause non-Hodgkin lymphoma (a potentially deadly cancer) in humans.

It's now up to U.S. District Court Judge Vince Chhabria and California State Court Judge Ioana Petrou to decide whether to believe the scientists and allow hundreds of lawsuits against Monsanto go to trial-or deny cancer victims their day in court, based on Monsanto's claims that Roundup is safe."

Published by Organic Consumers Association, March 18, 2018

Link to article: https://action.organicconsumers.org/content_item/oca-email?email_blast_KEY=1386813

Article Title: European Authorities Violated Own Rules to Conclude Glyphosate is Not Carcinogenic

Excerpts:

"A new peer-reviewed analysis shows that EFSA and ECHA twice watered down the statistical strength of evidence linking glyphosate with tumor increases."

"The new analysis shows that if the European authorities had properly applied their own benchmarks and "weight of evidence" approach, they would have inevitably concluded that glyphosate is carcinogenic. The analysis includes a science-based rebuttal of ECHA's claim that it adequately addressed concerns about how it applied statistical analyses and the weight of evidence approach.[2]"

Published by Sustainable Pulse, March 17, 2018

Link to article: https://sustainablepulse.com/2018/03/17/european-authorities-violated-own-rules-to-conclude-glyphosate-is-not-carcinogenic/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_glo

bal_breaking_news&utm_term=2018-03-21#.WrMVMWrwa1s

Article Title: New Study Links Glyphosate to Shortened Pregnancy Lengths in American Women

Excerpts:

"A new peer-reviewed study published in Environmental Health on Friday has linked glyphosate levels with shortened pregnancy lengths, in the first ever study of glyphosate exposure in pregnant women in the U.S.. This study adds to the pressure on regulatory authorities to take action on the world's most used herbicide."

Published by Sustainable Pulse, March 11, 2018

Link to article: https://sustainablepulse.com/2018/03/11/new-study-links-glyphosate-to-shortened-pregnancy-lengths-in-american-women/?utm_source=newsletter&utm_medium=email&utm_campaign=breaking_new_study_links_glyphosate_to_shortened_pregnancy_lengths_in_american_women&utm_term=2018-03-11#.WqXPh2rwa1t

Article Title: Monsanto's Toxic Legacy: An Investigative Reporter Talks Glyphosate

In the following interview, for Acres U.S.A., Tracy Frisch interviews Carey Gillam about her first book: Whitewash: The Story of a Weed Killer, Cancer, and the Corruption of Science.

Interview excerpts:

"In Whitewash, you write about the failure of government agencies to test food for glyphosate residues, despite the existence of monitoring programs for many types of pesticides. How did they manage to avoid testing for glyphosate?"

A number of years ago this became a pet peeve of mine. Every year the USDA and the FDA monitor food for pesticide residues. They're required to do this testing and keep track of it in a database. This allows government agencies to determine if food producers are violating the allowable levels determined by the EPA for particular pesticides. The monitoring program also enables us to understand what we're taking into our bodies. As I've stressed, glyphosate is the most widely used herbicide in history, but it's the only pesticide that neither the USDA nor the FDA have tested for. (The USDA did one special project in 2011 looking at glyphosate residues in soybeans and found residues of the weed killer in more than 90 percent of the samples.) For decades they have refused to test for it. Many years ago I started asking them why they didn't test for glyphosate. They told me that, first, it's so safe so it doesn't matter if they test for it. Second, they would say that it's really expensive to test for. The third reason was, "We know that if it's in the food, it's probably not in very high amounts." I found that laughable.

Published by In these Times, March 9, 2018

Link to Article: http://inthesetimes.com/rural-america/entry/20981/carey-gillam-monsanto-glyphosate-roundup-cancer-whitewash-pesticides?link_id=11&can_id=f5b503c97d8ff0adc2865a8c2b98e655&source=email-a-new-movement-for-rent-control-is-spreading-across-the-us-where-are-the-major-human-rights-orgs-on-the-us-war-on-yemen&email_referrer=email_315469&email_subject=a-new-movement-for-rent-control-is-spreading-across-the-us-where-are-the-major-human-rights-orgs-on-the-us-war-on-yemen

Article Title: Spinning Science and Silencing Scientists on the Dangers of Glyphosate

Excerpts:

"What happens when Monsanto doesn't like what the World Health Organization (WHO) has to say about its flagship product, Roundup weedkiller?

The chemical company convinces U.S. lawmakers to hold a "smoke and mirrors" Congressional hearing, under the guise of "defending scientific integrity," but really to undermine the unanimous determination by 17 international scientists, based on their analysis of independent, peer-reviewed science, that Roundup is "probably carcinogenic to humans." "

Published by Organic Consumers Association, February 7, 2018

Link to Article: <https://www.organicconsumers.org/blog/spinning-science-and-silencing-scientists-dangers-glyphosate>

A Minority Staff Report Prepared for Members of the Committee on Science, Space & Technology U.S. House of Representatives, February 2018

Excerpts:

"What happens when Monsanto doesn't like what the World Health Organization (WHO) has to say about its flagship product, Roundup weedkiller?

The chemical company convinces U.S. lawmakers to hold a "smoke and mirrors" Congressional hearing, under the guise of "defending scientific integrity," but really to undermine the unanimous determination by 17 international scientists, based on their analysis of independent, peer-reviewed science, that Roundup is "probably carcinogenic to humans." "

Link to Report: <https://www.baumhedlundlaw.com/pdf/monsanto-documents/Final-minority-report-glyphosate-spinning-science-silencing-scientists.pdf>

Article Title: Ranking Member Bonamici's Opening Statement for Glyphosate Assessments Hearing

Excerpts:

"Attempts by industry to mischaracterize the scientific debate appear intended to undercut the scientific evidence regarding the possible dangers of glyphosate and its potential impact on human health. We must make sure any chemical review is not undone by undue corporate influence or misleading scientific studies."

A February 6, 2018 Press Release

Link: <https://democrats-science.house.gov/news/press-releases/ranking-member-bonamici-s-opening-statement->

glyphosate-assessments-hearing

Article Title: Ranking Member Johnson's Opening Statement for Glyphosate Assessments Hearing

Excerpts:

"Mr. Chairman, chemicals have the potential to greatly improve our quality of life, when developed and produced in a responsible manner. However, when produced or proliferated irresponsibly or without sufficient understanding of their potential impacts, chemicals can pose a grave and significant risk to every one of us. Unfortunately, by the time we realize the harm being caused by unsafe exposure to such toxic chemicals, the damage has often already been done, and we are left regretting the fact that there might have been preventative actions we could have taken to protect ourselves if we had a better understanding of the hazards."

"The Minority Staff has produced a staff report that documents some of the tactics Monsanto has used to undermine the IARC monograph and scientific findings on glyphosate in general. I am attaching this report to my statement."

A February 6, 2018 Press Release

Link: <https://democrats-science.house.gov/news/press-releases/ranking-member-johnson-s-opening-statement-glyphosate-assessments-hearing>

Article Title: Shocking Study Shows Glyphosate Herbicides Contain Toxic Levels of Arsenic

Excerpts:

"Prof. Gilles-Eric Seralini from the University of Caen Normandy, France, and his colleagues Dr. Nicolas Defarge and Dr. Joël Spiroux, have discovered several new findings which crush the pesticide industry's claim that the 'inert' ingredients in glyphosate-based herbicides do not need regulating:

"Seralini and his team also searched for other known toxic and endocrine-disrupting elements in 22 pesticides, including 11 glyphosate-based herbicides. They discovered several heavy metals in most formulations, in particular arsenic, chromium, cobalt, lead and nickel, which are known to be toxic and endocrine disruptors. All diluted formulations except one contained a cocktail of these metals."

Published by Sustainable Pulse, January 8, 2018

Link to Article: <https://sustainablepulse.com/2018/01/08/shocking-study-shows-glyphosate-herbicides-contain-toxic-levels-of-arsenic/#.WlfZIKvTm1s>

Article Title: The Monsanto Papers: MDL Glyphosate Cancer Case Key Documents & Analysis

Excerpt:

"More than 270 lawsuits are pending against Monsanto Co. in U.S. District Court in San Francisco, filed by

people alleging that exposure to Roundup herbicide caused them or their loved ones to develop non-Hodgkin lymphoma, and that Monsanto covered up the risks. The cases have been combined for handling as multidistrict litigation under Judge Vince Chhabria. The lead case is 3:16-md-02741-VC. Additionally, at least 1,100 plaintiffs have made similar claims against Monsanto in state courts. The first trial in the Roundup litigation is set for June 18, 2018 in the Superior Court for the County of San Francisco."

Published by US Right to Know, November 2017

Link to Article: <https://usrtk.org/pesticides/mdl-monsanto-glyphosate-cancer-case-key-documents-analysis/>

Article title: How Monsanto captured the EPA (and twisted science) to keep glyphosate on the market

Excerpts:

"We have closely examined the publicly available archive of EPA documents from the earliest days of the agency's consideration of glyphosate. Significant portions of the relevant documents have either been partially redacted or omitted entirely. But this archived material reveals that EPA staff scientists, who found much of the data submitted by Monsanto unacceptable, did place great weight upon a 1983 mouse study that showed glyphosate was carcinogenic."

"Yet their interpretation was subsequently reversed by EPA upper management and advisory boards, apparently under pressure from Monsanto. In years to come, that pivotal 1983 mouse study would be buried under layers of misleading analysis to obscure its meaning. Today, the EPA and Monsanto continue to cite that study as evidence that glyphosate poses no public health risk, even though the study's actual evidence indicates otherwise."

Published on Nation of Change, November 3, 2017

By Elizabeth Grossman

Link to full article: <https://www.nationofchange.org/2017/11/03/monsanto-captured-epa-twisted-science-keep-glyphosate-market/>

Article title: Excretion of the Herbicide Glyphosate in Older Adults Between 1993 and 2016

By Paul J. Mills, PhD1; Izabela Kania-Korwel, PhD2; John Fagan, PhD2; et al

Excerpts:

"The herbicide Roundup is sprayed onto genetically modified crops and applied as a desiccant to most small non-genetically modified grains. Use of this herbicide has increased since 1994 when genetically modified crops were introduced in the United States. Glyphosate, the primary ingredient in the herbicide, is found in these crops at harvest.¹ Environmental exposure through dietary intake of these crops has potential adverse health effects and can be assessed by measuring urinary excretion.^{2- 4} We measured excretion levels of glyphosate and its metabolite aminomethylphosphonic acid (AMPA) in participants from the Rancho Bernardo Study (RBS) of Healthy Aging."

Published in the Journal of the American Medical Association (JAMA), October 24/31, 2017

Link to full article: <https://jamanetwork.com/journals/jama/article-abstract/2658306>

Article title: Monsanto Secret Documents

Excerpts:

"On June 30, 2017, attorneys from Baum, Hedlund, Aristei & Goldman, along with the leadership of the Roundup multidistrict litigation (MDL), challenged the protection of the documents below, in an effort to make them available to the public. In a meeting to discuss the matter, Monsanto told the plaintiffs' attorneys to "go away" and that the company would not voluntarily agree to de-designate any documents."

"The documents below allow people to see what is happening "behind the curtain" of secrecy that normally shrouds ongoing litigation. Along with each document, you will find a short description, along with the document's relevance to the ongoing Monsanto Roundup litigation. These documents tell an alarming story of ghostwriting, scientific manipulation, collusion with the Environmental Protection Agency (EPA), and previously undisclosed information about how the human body absorbs glyphosate. The following secret documents help us better understand the serious public health consequences of Monsanto's conduct in marketing the herbicide Roundup."

Published by attorneys from Baum, Hedlund, Aristei & Goldman, September 2017

Link to full article: <https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/monsanto-secret-documents/>

Article Title: Judge Threatens to Sanction Monsanto for Secrecy in Roundup Cancer Litigation

Excerpts:

"Nearly a year after a mysterious leak of industry-friendly information from the Environmental Protection Agency, many pressing questions remain about the agency's interactions with agribusiness giant Monsanto Co. and its handling of cancer concerns with Monsanto's top-selling herbicide. But thanks to a federal court judge in California, we may soon start getting some answers.

The transcript of a recent court hearing reveals that Judge Vince Chhabria, who is overseeing a combination of more than 55 lawsuits filed against Monsanto in the U.S. District Court for the Northern District of California, warned Monsanto that many documents it is turning over in discovery will not be kept sealed despite the company's pleas for privacy. He threatened to impose sanctions if Monsanto persists in "overbroad" efforts to keep relevant documents out of public view."

Published in Huffpost, May 16, 2017

Link to article:

https://www.huffingtonpost.com/entry/judge-threatens-to-sanction-monsanto-for-secrecy-in_us_58c2de66e4b0c3276fb78433

Please read about these recent lawsuits against
Monsanto related to glyphosate

Agricultural laborers and gardeners are filing lawsuits against Monsanto which allege that Roundup caused their non-Hodgkin's lymphoma

Source: Class Action .com,

Link: <https://www.classaction.com/roundup-weed-killer/lawsuit/>

Lawyers for Roundup Cancer Claims: Free Case Review

Source: Saiontz & Kirk, P.A.

Link: <https://www.youhavealawyer.com/roundup/>

Roundup and Lymphoma: What You Need To Know

Source: NAPOLI SHKOLNIK, Attorneys at Law

Link: <https://www.napolilaw.com/article/roundup-lymphoma-need-know/>

Thousands of people now have non-Hodgkin's Lymphoma due to glyphosate (Roundup) exposure, warns legal firm that's suing Monsanto

Source: Natural News

Link: <http://www.naturalnews.com/2017-03-23-thousands-of-people-now-have-non-hodgkins-lymphoma-due-to-glyphosate-roundup-exposure-warns-legal-firm-thats-suing-monsanto.html>

Roundup Cancer Lawsuit -- Get a Free Legal Consultation

Source: NastLaw LLC

Link: <https://nastlaw.com/roundup-lawsuit/>

Products Liability Litigation for Cancer and Lymphoma after Exposure to Roundup Weed Killer

Source: OnderLaw

Link: <http://www.onderlaw.com/products-liability/roundup-cancer.aspx>

Roundup Lawsuit

Source: Schmidt Firm, PLLC

Link: <https://www.schmidtlaw.com/roundup-lawsuit/>

Roundup Non-Hodgkins Lymphoma Lawsuit

Source: Matthews and Associates,

Link: <http://dmlawfirm.com/roundup-non-hodgkins-lymphoma-lawsuit/>

Roundup and Non-Hodgkin Lymphoma Lawauit

Source: Brown & Crouppen, P.C.

Link: <http://www.browncrouppen.com/defective-products/roundup-non-hodgkin-lymphoma/>

This would be enough to convince any reasonably intelligent human to never again apply herbicides that contain glyphosate.

You are the one that must live with yourself for the rest of your life.

If the final EA still allows the application of herbicides that contain glyphosate it will be necessary to send hardcopies of this comment section and Glyphosate Kills Attachment to the Cochise county commissioners at PO Box CK, Bisbee, AZ 85603 for use in court at a later date.

You will soon learn that you cannot play games with people's lives with impunity.

Request for changes to be made to the final NEPA document: Clearly indicate "herbicides that contain

glyphosate will not be used anywhere, at any time, for any reason as part of this timber sale."

Failure to tell the public this chemical will not be applied to vegetation in your forest leaves the door open for you to apply glyphosate. This violates 18 U.S.C. § 1001(c), 40 CFR 1501.2 (b), 40 CFR 1502.16(a) and (b), 40 CFR §1508.27(b)(2), 40 CFR and the Apr. 21, 1997 Executive Order No. 13045

40 CFR §1508.27(b)(2) because the FOIA intensity discussion will not discuss the degree to which the proposed action affects public health or safety.

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)
Grangeville, Idaho 83530
da99333@gmail.com