



BEYOND PESTICIDES

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September 13, 2023

Jamie L. Davidson
Forest Supervisor
Allegheny National Forest
4 Farm Colony Drive
Warren, PA 16365

Dear Mr. Davidson:

We are writing to request that the Forest Service conduct a full Environmental Impact Statement (EIS) under the rules of the National Environmental Policy Act for the proposed pesticide spray program under its Invasive Plant and Interfering Vegetation Treatment for the Allegheny National Forest. While we realize that this treatment plan extends previous work conducted by the Forest Service, it reflects a major escalation of the use of poisons on federal land and, in our view and as the science shows, requires the in-depth review required of an EIS and missing from the Environmental Assessment presented to the public for comment in August 2023.

Proposed Toxic Chemical Use Analysis Deficient

In its plan the Forest Service is proposing the use of eight toxic chemicals, including glyphosate, imazapic, imazapyr, indaziflam, metsulfuron methyl, sethoxydim, sulfometuron methyl, and triclopyr. This includes aerial and ground application with widespread exposure to wildlife, soil organisms, waterways, and people resulting in nontarget contamination.

The proposal does not fairly disclose to the public the range of potential adverse effects to people and the environment. The discussion of glyphosate, for example, does not disclose to the public the range of scientific literature on hazards not currently considered by the registration process conducted by the U.S. Environmental Protection Agency (EPA). The scientific literature has clearly implicated and found through independent peer review widespread effect to the gut biome of organisms, with serious concerns for the health of wildlife and people. A study published in *Frontiers in Environmental Science* finds the herbicide glyphosate negatively affects microbial communities, indirectly influencing plant, animal, and human health. Exposure to sublethal concentrations of glyphosate shifts microbial community composition, destroying beneficial microorganisms while preserving pathogenic organisms. In

addition to this study, the scientific literature commonly associates glyphosate with human, biotic, and ecosystem [harm](#), as [a doubling](#) of toxic effects on invertebrates, like pollinators, has been recorded since 2004. The authors caution, “[O]utbreaks of several animal and plant diseases have been related to glyphosate accumulation in the environment. Long-term glyphosate effects have been underreported, and new standards will be needed for residues in plant and animal products and the environment.” With an increasing number of reports on the relationship between glyphosate and human health, including [potential effects on the human gut microbiome](#), advocates are calling on global leaders to eliminate chemical use. These are critical issues that the Forest Service is responsible for evaluating under NEPA and an EIS. While the assessment considers specific species whose primary habitat would be affected by the spray program, the Forest Service has a responsibility to look at the entire ecosystem, not simply specific species that it identifies.

Exposure patterns and effects of nontarget exposure or impacts associated with unlabeled uses requires further evaluation. It is simply inadequate for the Forest Service to establish in its EA buffer areas at 25 feet from perennial streams, impoundments, seeps, springs, or intermittent streams with flowing water the day of the spraying and 10 feet from dry intermittent streams without disclosing to the public the science associated with these calculations related to the specific site of application and the application method. Has the Forest Service evaluated studies that show that the use pattern(s) it is proposing will not result in harm of the full range of species it is entrusted with protecting both from short- and long-term effects from direct and residual exposure? It does not appear so. This pattern of what appears to be arbitrary assignments of distance within buffer areas does not meet standards of protection that are required under the law for all the pesticides proposed for use.

As a baseline, simple registration of a pesticide and proposal for use on National Forest land does not meet the standards of NEPA. It is critical that the Forest Service in its assessment fully consult the independent science on each of the chemicals proposed for use and make determinations on the unique conditions on the sites where they will be used. To that end, the Forest Service should consult hazard assessments that review the independent peer reviewed literature on sites like [Gateway on Pesticide Hazards and Safe Pest Management](#) at [beyondpesticides.org](#), which it can assess information required for an informed decision of the potential impact of specific pesticides on the Alleghany National Forest. There are other databases that can be utilized for this purpose. The point is that the lack of depth and breadth of this EA does not meet the standards of NEPA.

Robust Alternatives Analysis Required

The EA states, “The responsible official and interdisciplinary team considered whether it would be possible to fulfill the need for action by exclusively using manual and mechanical treatment methods but determined that doing so is not feasible.” However, it is critical that an EIS considers the use of goats for weed management and biological tools that have been used effectively in land management. This failure to fully consider the nonchemical range of alternatives that go beyond simple mechanical removal, should be corrected with an EIS, as required by NEPA.

Regulatory Responsibility under 2021 Executive Memorandum Update

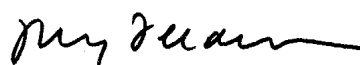
The Forest Service has a responsibility under the President's Executive Memorandum, [Modernizing Regulatory Review](#) (2021), building on previous Executive Orders and updates to regulatory review, to seriously and with urgency confront the climate crisis, biodiversity collapse, and disproportionate harm to people of color communities. The Forest Service is a critical agency to carry out the standards of this Memorandum and, again, the Service could meet this responsibility with an EIS. The Memorandum states, "Our Nation today faces serious challenges, including a massive global pandemic; a major economic downturn; systemic racial inequality; and the undeniable reality and accelerating threat of climate change. It is the policy of my Administration to mobilize the power of the Federal Government to rebuild our Nation and address these and other challenges. As we do so, it is important that we evaluate the processes and principles that govern regulatory review to ensure swift and effective Federal action. Regulations that promote the public interest are vital for tackling national priorities." Because the Forest Service manages land, it has a responsibility under this Memorandum to consider the impacts of its decisions on climate. That has not been done in the EA and should be carried out from the perspective of petrochemical pesticide use and its impact on atmospheric carbon and potential for drawdown from the atmosphere with a nonchemical plan. These considerations must be incorporated into an EIS on the Service's pesticide use proposal.

Similarly, while the Forest Service mentions worker exposure in its assessment, it does not consider long-term effects such as those published by the International Agency for Research on Cancer (IARC) that link glyphosate to non Hodgkin lymphoma. Regarding the Presidential Memorandum, the worker exposure analysis must, but does not, include an assessment of the impact on people of color and environmental justice, given established documentation of disproportionate risk in this community.

We appreciate the opportunity to comment on the Forest Service proposal for widespread pesticide use without the appropriate analysis of the range of pesticides proposed for use and the full range of alternatives that are available for management of weeds. As a steward of the environment and under the National Environmental Policy Act, the Forest Service has both a legal and an incredibly important environmental and public health responsibility to manage land with a full and robust assessment of harm and alternatives. That has not been done here. It is our request that the Forest Service engage in a more robust review through a complete EIS.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Feldman", with a stylized, flowing script.

Jay Feldman
Executive Director