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Kathleen Castro
Groveland Ranger District
24545 Highway 120
Groveland, CA 95321

Re: Monotti Urban Fuel Reduction and Plantation Thinning Project

Dear Ms. Castro,

Californians for Alternatives to Toxics (CATs) is a public interest, non-profit organization that is concerned about the use of pesticides and promotes alternatives to pesticide use in California. CATs has historically commented on many Forest Service fuel reduction, thinning and forest health projects due to the common use of the pesticide borate in these types of activities as well as herbicide treatments for invasive plant species.

CATs shares your concern for hazardous fire conditions, forest health issues and invasive plant species. However, after reading the scoping letter for the Monotti Urban Reduction and Plantation Thinning Project CATs has some questions, recommendations and concerns about herbicide use and the project.

CATs believes that the Monotti project is significant with a proposed treatment area of 3,295 acres, three proposed herbicides for noxious weed management and large treatments of mechanical thinning, mastication and prescribed fire that may lead to future herbicide use.

While it is well known that noxious weeds present a serious threat to the native ecology of our national forests, it is troubling to see that the proposed project relies almost completely on herbicides for their management. While it is encouraging to see that a denser tree stands for shading around noxious weeds will be maintained (page 9), we believe this holistic approach should be further developed into the project. There are many effective manual and non-chemical methods already in use by the Forest Service for the listed noxious weeds. A full range of alternatives needs to be considered and analyzed.

Since the project area is in a fire prone and human inhabited area, perhaps the help of a local volunteer crew or fire safe counsel might be employed to manage the known 45 acres of invasive plants. Community/Agency invasive plant removal partnerships are thriving all over the state. For a good example please see the Salmon River Restoration Council website (<http://www.srrc.org/>). How will the local community participate in the Monotti project and what role will adjacent landowners have in maintaining their properties free of noxious weeds to prevent re-infestation in Stanislaus National Forest?

CATs and its diverse member-base are concerned about fuel reduction projects since opening up the forest canopy and clearing underbrush can lead to further invasive and/or undesirable plant introduction, infestation and re-growth. As stated in the scoping document "these weed might spread from their current locations as a result of plantation thinning and fuel reduction activities". With this foresight, an integrated pest management (IPM) protocol that does not rely on herbicide should be developed. It is imperative that the future vegetation management needs created by this project are thoroughly addressed and analyzed.

The Forest Service also has a long history of relying on herbicides to manage native brush that grows back excessively following plantation thinning and fuel break clearing. How will native brush be managed as a result of the project in the decades ahead?

While the scoping document did not mention the use of any borate or boric acid, based on historical use, CATs is concerned that the Monotti project would include the use of borate (commercially known as Sporax). Borate is frequently used in both forest thinning and is applied to cut stumps as a fungicide to combat the spread of annosus root rot. Does the Forest plan on using borate in this project? Borate is a registered pesticide in the State of California. It is not naturally occurring in the Stanislaus National Forest. Since it is a non-selective herbicide, insecticide and fungicide and falls under pesticide regulation, the Forest must disclose any potential for its use, including detailed analysis and alternatives to its use. The Forest Service must evaluate the methods and type of pesticides that are planned for use and include it in public documentation for this project.

The scoping document for the Monotti project did not adequately describe the project as CATs has many questions about the proposal. On page 9, the document states that noxious weeds along roads and in fuel breaks would be managed with the intent to eradicate and that this would be a long-term commitment over several years. How long is the scope of the proposed project? How many herbicide applications will be done? What time of year will the herbicides be used and in what quantity?

CATs has concerns about the three chemicals proposed for use in the Groveland Ranger District for this project and we would like to quickly point out some particular concerns.

Glyphosate can have harmful effects on non-target plants and native soil microorganisms. Glyphosate and the toxic surfactants it is mixed with translocate from the body of the plant into the root where it leaches into the soil and affects microorganisms and fungi. This would be counter-productive for your project. What's more, bare chemically treated soil provides an opportunity for hardy non-native weeds to establish colonies and out-compete the already struggling native plant species.

Triclopyr is recognized by the US Environmental Protection Agency (EPA) as being moderately persistent and highly mobile with the potential to contaminate surface and ground water. It is slightly toxic to birds and its break down products is moderately to highly toxic to fish and aquatic invertebrates. What animals are present in the project area and how might they be affected by the decision to use herbicides? Are there any special status animals present within the project range?

According to the EPA, clopyralid is persistent in soil and field studies have measured it in soil as long as 14 months after application. Clopyralid and its inert ingredients are extreme eye irritants to mammals and may cause blindness. It is likely to contaminate water and despite relatively low use it has been found in 2 of the 20 river basins studied by the US Geological Survey.

We ask you to consider the long-term costs of herbicide applications, particularly those to the environment, the natural area, and the people who live near, work or recreate in the project area. Invasive plants and noxious weeds present a management hurdle but CATs strongly believes that it can be overcome with foresight, manual methods and IPM protocols.

We look forward to reviewing further materials for the Monotti Urban Fuel Reduction and Plantation Thinning Project.

Sincerely,

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