Californians for Alternatives to Toxics

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Cheryl Beyer- Interdisciplinary Team Leader
Lake Tahoe Basin Management Unit
35 College Drive
South Lake Tahoe, CA 96150

Re: Proposed Action for the Terrestrial Non-native Plant Species Treatment Project

Dear Ms Beyer,

Thank you for soliciting the input of Californians for Alternatives to Toxics (CATs) for the proposed action for the Terrestrial Non-native Plant Species (NIPS) Treatment Project. CATs shares your concern about the detrimental effects of non-native invasives on California's beautiful public lands.

CATs is a public interest, non-profit organization that for 27 years has been concerned about activities undertaken by the US Forest Service that directly involve the use of pesticides, including herbicides, or create conditions that can lead to the use of pesticides. Members of CATs depend for their livelihood, health, culture, education and well being on the health and productivity of public forests in California. Members observe, recreate, gather or otherwise enjoy the resources of the Forest, or simply derive satisfaction from knowing that it is there, alive with wildlife, still beautiful and available to visit when they choose. The Forest is public land that, as such and as a part of the State, holds immeasurable value for CATs members.

While faced with managing 19 NIPS and over 22 known acres of infested land is a formidable task, CATs strongly believes that the Forest Service will be more successful restoring and preserving the native ecology with manual and non-chemical methods in the long-run. CATs would like to see the Lake Tahoe Basin Management Unit (LTBMU) create an integrated pest management (IPM) procedure for this proposed action that would utilize monitoring and non-chemical control, containment and eradication methods.

In the Background section of the Scoping document LTBMU states concern for water quality and sedimentation caused by decreased root structure from invading non-native plants. CATs would like to point out that using herbicides to kill of these plants also has a potential to pollute the water. Creating bare earth with herbicides, such as non-selective ones like the proposed glyphosate, creates a situation where banks become destabilized or heavy rains wash dirt into streams and lakes. CATs recommends that a native plant re-seeding and re-vegetation element be implemented as part of this NIPS treatment plan.

It is encouraging to see that LTBMU plans to use several manual methods including pulling, clipping, mulching, tarping, and thermal. However, we noticed that the proposed thermal treatment in the project is for a very small area. We see this as a method to be further explored and developed as a more comprehensive and ambitious alternative in the DEIR.

CATs has concerns about chemicals used on public lands and we would like to quickly point out some particular concerns about the four herbicides selected for this particular project.

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 can leach into the soil and poison other organisms. 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.

Chlorsulfuron is listed on the California Safe Drinking Water and Toxic Enforcement Act of 1984 (Prop 65) as a known female and male developmental toxin. Chlorsulfuron is also listed on the California Department of Pesticide Regulation Groundwater Protection List for its known potential to pollute ground water. This herbicide seems a particularly risky choice for our public lands.

Aminopyralid is a recently registered herbicide that is getting media coverage for its long lasting toxic effects. It is extremely persistent and when ingested by grazing mammals it passes through the system unchanged and maintains its toxicity. This chemical raises great concern for CATs and its members because of the potential to effect foraging wildlife and non-target plants after excretion.

As stated in the Proposed Action, triclopyr is only to be used in combination with aminopyralid (page 9 of the Scoping document). The synergistic effect of combining herbicides is an area of research that is greatly lacking. CATs contends that the true repercussions of using triclopyr and aminopyralid will not be able to be fully and accurately analyzed until further research is done.

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 and use the Lake Tahoe Basin. CATs sympathizes with the difficulty of eradicating invasive plants and suggests funds be allocated for further research and experimentation with manual methods. Other National Forests in our beautiful country would certainly benefit from the foresight and modern forest management practices used in the Lake Tahoe Basin Management Unit

We look forward to reviewing further materials and the DEIR for this project.
Sincerely,

Vanessa M. Vasquez
Programs and Policy Associate