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December 2, 2009

Todd Johnson, Project Team Leader
Shasta-Trinity National Recreation Area
14225 Holiday Road
Redding, CA 96003

Re: Packers Bay Invasive Plant Species Removal Project

Dear Mr. Johnson,

Californians for Alternatives to Toxics (CATs) shares your concern about the detrimental effects of non-native invasive species on California's public lands. We applaud Shasta Lake Unit's efforts to utilize an integrated approach for invasive vegetation management that emphasizes manual cutting, hand pulling, prescribed fire and a native re-vegetation program.

While managing Scotch broom, French broom and Spanish broom encroaching on rare plant species and down into gulches is a formidable task, evidence supports the fact that Shasta Lake Unit of the Forest Service will be more successful restoring and preserving the native ecology with manual and non-chemical methods in the long-run.

The scoping document states an assumed need for herbicide use to eradicate the brooms and proposes the use of glyphosate. This conclusion is based on the Forest Service's view that two non-chemical projects in 2004-2005 were ineffective while one glyphosate-based broom eradication project on I-5 was successful. Analyzing past projects is an important tool but CATs wonders if the "ineffective" non-chemical broom eradication projects involved an integrated approach (which the Shasta Lake Unit is proposing here) with native re-vegetation or repeat cut and hand pulling treatments? Not enough information was provided at scoping about these projects and the relationship to the proposed activities and viable alternatives. We look forward to a more complete and transparent discussion and analysis.

Because it appears that the Packers Bay Invasive Plant Species Removal Project is committed to integration and innovation, CATs suggests that the follow-up treatments *exclude* herbicide application and focus on the other proposed elements: hand pulling, under burning, re-cutting new sprouts and re-vegetating with native plants.

If a primary objective of the project is to "eliminate broom and seed bank in the project area using a comprehensive systematic approach over several years" surely repeat cutting, hand pulling and selective under burning would be more beneficial for the native ecology than repeat and compounding toxic treatments. Brooms are not shade tolerant and primarily grow in full sun. UC Davis suggests an integrated pest management approach (IPM) for brooms that utilizes shade by native shrubs and trees as an effective long-term solution. Herbicide use for this project would be counterproductive because it would kill non-target plants and shrubs needed to shade out the invasive broom. CATs encourages Shasta Lake Unit to develop an IPM program for this project that preserves wanted and necessary native vegetation re-growth.

Encouraging native vegetation naturally and without chemicals will have another benefit for broom management. Native shrubs and chaparral will provide cover for native biological control. Grouse and

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quail, both found at Whiskeytown National Recreation Area, are known broom seed predators and can effectively reduce the seed bank particularly if native shrub cover is provided.

The scoping document states that the use of glyphosate applied to target plants by hand-held spray bottles will not impact desirable vegetation and other non-target organisms. Mounting evidence and research indicates that this is not true. Non-selective herbicides such as glyphosate are known toxic substances and the potential environmental impact to non-target organisms must be evaluated in environmental analysis for this project.

As stated in the proposed action “invasive plant treatment activities may take place for up to ten years to allow adequate time to treat new seedlings”. How many herbicide applications are proposed? This is something that will need to be addressed in further environmental analysis for the decision maker to make an informed decision about the risk and potential environmental impact.

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 other organisms. Bare, chemically treated soil provides an opportunity for hardy non-native plants (like the pervasive brooms with long-lasting viable seed banks) to re-establish colonies and out-compete struggling native plant species and reduces habitat for wildlife.

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 Shasta Lake and Packers Bay Road and to with this against a robust IPM solution that does not include herbicides.

We look forward to reviewing further materials and the environmental analysis for this project.

Sincerely,

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