

March 25, 2024

Parker Brown, Ava Hamstead, Ramine Mohebbi, Claire Pickett
University of Arizona
Environment and Natural Resources 2
1064 Lowell Street
Tucson, AZ 85721

Stanislaus National Forest
Attn: SERAL 2.0
19777 Greenley Road
Sonora, CA 95370

To whom it may concern,

We are a collaborative student group associated with the University of Arizona in an Environmental Policy and Law course. We reviewed the "Social and Ecological Resilience Across the Landscape 2.0" draft EIS, and this letter is intended to outline concerns in regards to logging contracts and the use of glyphosate and its effects.

We admire that Stanislaus National Forest is taking proactive steps towards forest resilience and fire management. First, we would like to reference Arizona's Four Forest Initiative (4FRI) and the issues it has faced to ensure this EIS can learn and adapt from the southwest's largest forest management plan. In 2020, 4FRI and the USFS came under scrutiny after 200 old-growth trees were cut down, in direct conflict with stipulations made protecting the Spotted Owl. This was cited as accidental oversight, resulting from limited oversight of the contractors logging.

Here is the Center for Biological Diversity's press release on the issue:

<https://biologicaldiversity.org/w/news/press-releases/letter-to-forest-service-stop-cutting-down-centuries-old-trees-on-grand-canyons-north-rim-2021-01-14/>

Additionally, lack of funding and slow operation have resulted in the project falling short of its stated forest thinning and brush management goals.

For an in-depth review of the issues faced by 4FRI please see this High Country News editorial:
<https://www.hcn.org/issues/46-15/lost-in-the-woods/>

Based on the findings from 4FRI, it is our request that these issues be addressed in your EIS. We are concerned that the Stanislaus project may follow a similar fate as the 4FRI initiative. Firstly, what measures will be taken to ensure regulatory compliance with the logging contracts made through this plan to ensure the protection of owl species? Secondly, what steps can be taken to proactively ensure logging and restoration goals are met in the timeframe specified by the draft EIS? We request additional budgeting information for how the EIS will meet its goals.

We are also concerned about the forest service's planned herbicide use. While this was addressed through the first public comment period, we feel the Stanislaus National Forest's response does not sufficiently address the comments in regard to human health, biodiversity, and ecosystem health. We urge you to reconsider the use of glyphosate as an herbicide due to its non-selective nature. The use of this herbicide may damage desirable species in addition to invasive or undesirable vegetation. We also ask for specifics on how the evaluations mentioned combat herbicide drift into water bodies used by a variety of species including migratory birds as well as the contamination of insects and other food sources consumed by these species.

According to a collaborative study conducted by researchers from corresponding universities, there is a risk to amphibians due to their semi-permeable skin, and the long-term effects of glyphosate in conjunction with other herbicides in forests. We understand that the applicators of these products will be well trained, but there is still much unknown about glyphosate being used long term. The article also mentioned some mild concerns about the way glyphosate binds to sediments suspended in the water column, and how sediment interactive organisms may be affected by this. We have linked the article we are referencing here:

<https://www.mdpi.com/1999-4907/8/6/208>

In conclusion, we ask for more information on logging contracts, specifically about timeframe and budget, and for the Stanislaus National Forest to reconsider its use of glyphosate. Thank you.

Sincerely,

Parker Brown, Ava Hamstead, Ramine Mohebbi, and Claire Pickett