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First name: Natalie

Last name: Dawson

Organization: Audubon Alaska

Title: Executive Director

Comments:

We are writing to express concerns about the proposed Wrangell-Petersburg Invasive Plant Management project. The project would spray herbicides within a 3.7 million project area, including both wilderness and non-wilderness lands, with no annual treatment limit. Specifically, The proposed action is to "[t]reat invasive plants" on an estimated 5,811 gross acres of federal and non-federal lands through a combination of manual, mechanical and herbicide treatments. Herbicides include aquatic formulations of glyphosate, imazapyr and aminopyralid, applied by broadcast spray, spot spray and other methods, applied at rates at or below maximum rate stated on the product level. Spraying would include directly over water with imazapyr and glyphosate; aminopyralid sprayed up to water's edge.

We request that you rescope this project and instead plan to prepare an environmental impact statement. There are substantial questions about the environmental impacts associated with glyphosate in particular. Glyphosate is a non-selective herbicide and kills all plants including native plants that may not be able to recolonize habitat once eradicated due to competitive disadvantages relative to other plant species.

In 2015, the International International Agency for Research on Cancer (IARC) has identified glyphosate as a human carcinogen and likely cause of non-Hodgkins lymphoma. The IARC report identified carcinogenic impacts on animals and other adverse effects to fish. Other recent studies have identified effects to insects and amphibians. We request that a full DEIS review these effects to humans and project area fish and wildlife populations.

Also, we note that the scoping letter provides little site-specific information. The approach to herbicide spraying across the large project area is similar to the "Landscape Level Analysis" strategies for other Tongass National Forest projects. Judge Sharon Gleason rejected this approach in March 2020 in SEACC et al. v. U.S. Forest Service as a violation of NEPA. Any further analysis should provide greater detail about when and where members of the public could face exposure to herbicides.

We also ask that you develop a broader range of alternatives, including alternatives that rely exclusively on mechanical or hand treatment methods. There also needs to be an alternative that address prevention accompanied by analysis of the causes of invasive weed infestations. Finally, we request that you refrain from spraying herbicides in federally designated Wilderness areas.