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Comments: See attached letter regarding SERAL 2.0

Thank you for the opportunity to comment on the scoping notice for the SERAL 2.0 forest treatment project. I am a member of the Yosemite Stanislaus Solutions collaborative and represent the Central Sierra Chapter of Audubon (CSAS). The Audubon board supports your work to increase the resilience of the forest, provide economic opportunities to local communities and reduce safety hazards where necessary across public lands. The proposed SERAL 2.0 plan is a huge project, representing a significant portion of the Stanislaus Forest. Due to the short comment period, coinciding with the holidays, the CSAS board has not had a chance to review and weigh in on this proposal and CSAS reserves the right to submit additional comments as the Board continues to evaluate the proposal. These are my initial comments only, and they are intended to improve the project and to hopefully reduce controversy. 2.04 Fuel break Maintenance Using Herbicides 2.11 Non-Native Invasive Weed Control and Eradication (regarding synthetic herbicides) The CSAS does not support synthetic herbicide use on national forest lands. The Scoping document for SERAL 2.0 promotes herbicide use for fuel break maintenance, known mapped invasive plant infestations and potential spread areas, and new infestations. The proposal allows herbicides to be applied across thousands of acres in the project area. CSAS has been concerned that many wildlife species, including a wide variety of local and migratory bird species, would be exposed to the synthetic chemicals as they spend time in the sprayed vegetation areas. Besides other potential cascading food chain impacts, some birds may end up with prolonged exposure as they move through sprayed groundcovers, eat insects or other food sources contaminated with the herbicide, or perch on sprayed bushes. CSAS and others in the public oppose the use of synthetic chemicals that are not natural in the forest ecosystem. Any reduction in insect biomass or survival on chemically affected plants could have cascading impacts up the food chain. Herbicide use can also result in the potential pollution of water from herbicide drift during spraying by the applicators, and the breakdown by-products from herbicides eventually washing into streams and rivers. Whether the contamination effects are either potentially low or significant, the public perception could be one of concern if chemicals are approved for use across thousands of acres of public forest that serves as the primary watershed for local water users as well as downstream water users. Last year the National Audubon Society joined with a coalition of other concerned conservation groups to file a petition against the use of pesticides (including herbicides) on federal wildlife refuge lands. As one of the chemicals of concern, the petition pointed to glyphosate as just one of the herbicides that pose a risk to threatened and endangered species as well as more common species. Because that specific herbicide has received a high degree of study due to its widespread use, it has been identified by the World Health Organization and by other interests as a potential carcinogen. Other herbicides also pose varying levels of potential risk. {{See the Petition and the concerns about chemical risk at this link): [https://www.biologicaldiversity.org/campaigns/pesticides/reduction/pdfs/2022-2-24_NWR\[shy\]Full-Pesticide-BanwappxA.pdf](https://www.biologicaldiversity.org/campaigns/pesticides/reduction/pdfs/2022-2-24_NWR[shy]Full-Pesticide-BanwappxA.pdf) Because the proposed SERAL 2.0 plan would allow forest treatments across many thousands of acres, it poses more of a risk to bird species than a small isolated proposed project would pose. At the very least, if herbicide use is allowed to be applied widely, thousands of acres of wildlife habitat for birds and other species will be degraded or eliminated for some time by the spraying. I agree that choosing project treatments for this giant project that avoids raising significant public concerns appears to be desirable in order to gain YSS consensus. Public support is important. I also understand your objective to provide economic opportunities for this giant project. Since the Stanislaus Forest has promoted broadcast burning, targeted grazing, and other mechanical or hand treatments as effective treatment to reduce surface and ladder fuels, I urge that the Stanislaus Forest avoid controversy and eliminate the herbicide use for fuel breaks. With these alternative treatment methods, and the potential for local businesses to fill the void, there does not appear to be an emergency to justify spraying synthetic chemicals on this large project. Our organization would support instead that the Forest Service engage businesses, trained and certified to utilize broadcast burning, targeted grazing, and mechanical/hand treatments for fuel break maintenance, not herbicide treatments. Your role would be to identify the need for the industry, needed treatment areas, establish the rules, and monitor for compliance.

In support of these scoping comments, I refer to an article by the National Wildlife Federation describing how herbicides destroy bird habitat. <https://blog.nwf.org/2020/08/drifting-disaster/> In addition, the Smithsonian's National Zoo and Conservation Biology Institute has an online article entitled: "When it comes to pesticides, birds are sitting ducks". <https://nationalzoo.si.edu/migratory-birds/news/when-it-comes-pesticides-birds-are-sitting-shy-ducks> As our society grapples with many investments for the future, there are many good reasons to reverse past practices and re-introduce and initiate forest treatments to avoid catastrophic wildfires, but none should be detrimental to the environment or wildlife. The CSAS board may have additional concerns that they may address in future public comment opportunities, but the priority for submitting these scoping comments is the herbicide use and potential effects on wildlife, especially birds.