

Data Submitted (UTC 11): 3/19/2016 7:32:52 PM

First name: Iris

Last name: Rodden

Organization:

Title:

Comments: Dear CNF USFS,

My comments and questions concern portions of the EA and the BE documents. The EA lists Imazapyr and Imazapic in the scope as potential herbicides but yet there are no effects analyses for either of these in the BE. Why are these chemicals being proposed in scope without analyses of their effects on sensitive wildlife?

The EA is also unclear about how and where these herbicides will be applied. It states that herbicide will only be used in a wildland-urban interface of no larger than 10 chains (660 ft) at low elevations, then goes on to state it could be used in most vegetation communities to create openings, for removing mesquite in grassland areas, and where other treatments are ineffective. Please clarify as to whether all of these proposed herbicide uses are going to remain contained within the 10-2-1-chain buffer. Also, does the proposed method of "foliar application" include aerial delivery such as via helicopter or drone? Will the herbicide be broadcast or applied directly to the plant? Please clarify if foliar spray is likely to impact non-target plant or animal species, or if herbicide will be delivered directly to target individuals via manual backpack spray etc. to minimize overspray and non-target effects.

I would also like to say that while herbicides may be effective in maintaining vegetation-free areas, at least for a time, given some of the recent findings on the previously unknown effects of these chemicals (for example Glyphosate's recent "probable human carcinogen" determination by the WHO, believed mostly benign to this point), it may be misleading to confidently state that any herbicide use can actually "maintain a healthy ecosystem" and pose low-no risk to wildlife at even currently approved concentrations. It would be encouraging if the CNF could acknowledge the potential risks of these toxic chemicals and commit to using them as sparingly as possible if at all, preferably someday eliminating them entirely to manage for genuinely healthy ecosystems.

respectfully,

Iris Rodden

Tucson