

RECEIVED

IPM-S-52
JUL 14 2008

Pg 1 of 2

YOSEMITE NATIONAL PARK

Public Comment
Attn: Invasive Plant Management Plan EA

Superintendent, Yosemite National Park
P.O. Box 577
Yosemite, CA 95398

11 July 08

Dear Sir:

The following comments are submitted on behalf of the Sierra Club's Yosemite Committee. Hopefully they will be of value in your efforts to eliminate the many noxious exotic weed species invading and disrupting natural ecosystems in Yosemite National Park.

Invasive plants (and animals) are one of the greatest threats to the integrity of our National Park lands. Their presence and invasive nature compete with and displace the native plant and animal communities our National Parks were established to protect. Aggressive action employing the least damaging, environmentally safe control methods available are needed to prevent their spread into un-infested areas and to restore currently infested areas to natural conditions.

Mechanical removal combined with judicious use of selected herbicides proposed in preferred Alternative 2 targeting 22 high and medium high priority species would be the most acceptable control method presented. A formulation of the herbicide glyphosate containing the surfactant adjuvant R11 (approved for aquatic use in California) directly applied to target species will maximize eradication efficiency with the minimal environmental impacts projected in the EA. The NPS should be sure the breakdown products of the proposed herbicide formulations cited in appendix F,G, and H of the EA are safe, well understood and not harmful to non target species, and that applicators are fully trained in the proper use and knowledge of the specific formulation selected. Mechanical removal alone, similar to your no action alternative, would not kill subterranean root tissues and would require frequent labor intensive, mechanically

P		E	E	ORR				
RT	#S	LT	DT	UT	IA	IR	OR	TS

destructive actions preventing desired native plant succession and restoration objectives.

The use of a relatively new semi-selective, broad-spectrum herbicide, Aminopyralid, approved for use in California in 2006 that would target various invasive thistle species should proceed with considerable caution as much of the scientific data supporting the safety of glyphosate and R11 formulations in environmentally sensitive eco-systems are not yet available. As stated in appendix H of the EA, "mobility and degradation in field conditions are a concern," for this relatively new herbicide. Perhaps use of Aminopyralid might be delayed until more information on the environmental impacts of this relatively new herbicide becomes known. The Glyphosate/R11 formulation could be used on these thistle invaders until more information on this compound becomes available.

Other techniques for invasive plant control result in greater environmental impacts and risks than the combined mechanical removal and judicious application of appropriate herbicides proposed in Alternative 2.

Fire control methods result in smoke and air pollution, undesirable impacts on non target species, problematic use in steep terrain, and failure to kill subterranean root tissues of perennial invaders. Biological control methods are even more risky. They sound good and in some cases they are, but when unanticipated impacts occur to non-target native species they may not be reversible. When chemical control methods fail or yield undesirable results they can be terminated. Aren't we trying to avoid introducing new exotic species (including biological control agents) into Yosemite's complex ecosystem?

Combining mechanical removal techniques with judicious application of appropriate herbicides proposed in Alternative 2 will be the most effective method of controlling the many noxious plant species invading and destroying the natural ecosystems in Yosemite National Park. The sooner we get started the better.

Thanks for listening
Joe Fontaine, Chair Sierra Club Yosemite Committee