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07/13/2008 09:50 PM

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Subject: Invasive Plant Management Plan EA comments

Tehipite Chapter Yosemite Committee
Sierra Club

c/o:

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RECEIVED

JUL 14 2008

YOSEMITE NATIONAL PARK

13 July 2008

Superintendent
Yosemite National Park
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This is being emailed to yose_planning@nps.gov. Because of technical problems in the past, I am copying this to myself in an attempt to determine whether it appears to have transmitted properly.

If the e-mail attempt fails, this will be faxed to 209/379-1294.

Sir:

I. INTRODUCTORY

The following comments are submitted on behalf of the Tehipite Chapter of the Sierra Club. The Tehipite Chapter encompasses all of Yosemite National Park. Thank you for this opportunity to make suggestions which hopefully will be of use to you in your efforts to protect the visitor experience and the natural resources of Yosemite National Park.

These are comments on the Environmental Assessment, dated June 2008, for the Invasive Plant Management Plan for Yosemite National Park.

We have turned every page of the EA. But it contains a huge amount of information, and it is possible that we have missed something of importance. With that limitation in mind, we offer the following comments.

In general, it appears that most of the concerns we listed in the scoping process have been

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addressed.

II. WHAT WE DO NOT FIND IN THE PLAN

One notable exception is that we find no description of the decision-making process which will be used in determining which techniques will be used to address a specific situation. That is, how will the plan be implemented on the ground? The best plan in the world is useless if it is implemented poorly.

Another way of asking it is, what processes will be used to move from the programmatic plan to the specific projects?

What types of procedures will the staff follow? Will there be any opportunity for public involvement?

We note that the plan implies great awareness of the potential risks associated with herbicide use. But, at a recent NPS Open House (25 June 2008), park staff stated that the herbicides proposed for use are safe, and there is nothing to worry about. Observing such a discrepancy (between the published plan and statements by staff) lends special significance to the questions we raise above.

The above questions are intended to apply to all implementation techniques, but in particular to the use of herbicides or biologic controls.

The above questions are based on what we do NOT find in the EA. The next section of comments is based on what we DO find in the EA.

III. WHAT WE DO FIND IN THE PLAN

Page III-26 of the EA refers to El Portal as being a "park location". (It also refers to established invasive plants in El Portal serving as a "primary propagule source" for the spread of those species into higher vegetation zones of the park.)

Page III-24, in describing yellow star-thistle infestation, speaks as though El Portal is considered to be part of the park.

The Plan addresses its impact on the Merced Wild and Scenic River corridor, and refers to El Portal as being part of that corridor.

The Abstract (page not numbered) states that under the No Action Alternative, "Work crews would not use herbicides for invasive plant control."

However, the statement in the Abstract (the same statement also appears in other places) cannot be reconciled with the reality that herbicides have been used in the El Portal area. "No Action" usually means that management practices used in the past will continue.

This inconsistency is serious. It could lead people to advocate the No Action alternative with the understanding that it would mean no herbicide use. But some manager will come along and say that No Action means continuing past practices, and that means using herbicides.

Is El Portal considered to be part of the park for the purposes of this Plan, or not? If the answer is that it is not, then we would say that it should be. Reasons why it should be, identified by the Park Service itself, are alluded to in the first three paragraphs above, in this section of our comments.

IV. BIOLOGIC CONTROLS

The following is specific to biologic controls.

We note that it is proposed to use the same biologic controls which have been used in the past, but we find no analysis of the results of that past use. Were the control agents effective? Was their effect limited to the target species? Are the introduced species still present, or did they disappear? If they are still present, what impact are they having on natural values or visitor experience?

Since biologic controls have been used in the past, would their use continue under the No Action Alternative? (This question parallels the one we raised with regard to herbicide use.)

V. SUMMARY AND CONCLUSION

In concluding our comments on the Invasive Plant Management Plan EA, we note that the 2006 NPS Management Policies say,

4.4.5.3 Pesticide Use

A pesticide, as defined by the Federal Insecticide, Fungicide and Rodenticide Act, is any substance or mixture that is used in any manner to destroy, repel, or control the growth of any viral, microbial, plant, or animal pest. Except as identified in the next paragraph, all prospective users of pesticides in parks must submit pesticide use requests, which will be reviewed on a case-by-case basis, taking into account environmental effects, cost and staffing, and other relevant considerations. The decision to incorporate a chemical, biological, or bioengineered pesticide into a management strategy will be based on a determination by a designated IPM specialist that it is *necessary* and other available options are either not acceptable or not feasible. Pesticide applications will only be performed by or under the supervision of certified or registered applicators licensed under the procedures of a federal or state certification system.

The above policy states that pesticides will be used only when it has been determined, through a stipulated process, that such use is "necessary". We have looked for such a commitment in the EA, but have not found it.

There is no such thing as a "safe" pesticide. All possible alternatives should be seriously evaluated before pesticides are used. The National Park Service should be on the cutting edge of alternatives to poisons.

Thank you for providing a list of entities receiving the Environmental Assessment.

We request that the NPS post all public comments for the Invasive Plant Management Plan EA on the NPS web site in an accessible and timely manner.

Please send all future Yosemite planning documents to the Chair of the Sierra Club Tehipite Chapter Yosemite Committee. George Whitmore's address is above.

Thank you for seeking public input on the Invasive Plant Management Plan Environmental Assessment. We hope you find our comments to be useful.

George Whitmore, Chair
Tehipite Chapter Yosemite Committee
Sierra Club