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Sent to:  
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**cc: Ara Marderosian**

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**Subject:** Isabella Tamarisk Control Project Scoping Comments for Sequoia ForestKeeper®, Kern-Kaweah Chapter of the Sierra Club, & the Center for Biological Diversity

**To:** Sequoia National Forest,

Sequoia ForestKeeper ® (SFK), the Kern-Kaweah Chapter of the Sierra Club (the Club), and the Center for Biological Diversity (the Center), (collectively “conservation groups”) thank you for the opportunity to provide scoping comments on the proposed Isabella Tamarisk Control project.

On January 7, 2015, conservation groups provided supplemental comments to the U.S. Army Corps of Engineers regarding the “Isabella Lake Dam Safety Modification Project Draft EIS.” Those comments are attached as Exhibit A. There conservation groups expressed their ongoing concerns with management and protection of critical habitat for the Southwestern Willow Flycatcher and protection of proposed critical habitat for the recently-listed Western Yellow-billed Cuckoo in this area. With regard to the cuckoo,

Exposing the reservoir bottom has created a primary seral stage successional willow-cottonwood-tamarix forest where the cuckoo and other riparian obligate species will thrive within just a few years. The preferred breeding habitat of the Yellow-billed Cuckoo (western DPS) is mid-successional willow dominated forest. The drawdown area of the reservoir has recreated the natural succession of riparian vegetation along the once meandering South Fork Kern River, which has been missing from the ecosystem for many years due to human manipulation.

Exhibit A – Letter, p. 4 (internal footnotes omitted).

Although conservation groups support the removal of invasive tamarisks, they are concerned that the Forest Service will be relying too heavily on herbicides in the Isabella Tamarisk Control Project. Instead, as part of the environmental review process, the Forest Service should explore effective and less damaging alternatives including an alternative that prioritizes manual and mechanical methods to control tamarisks and minimizes the use of herbicides as a secondary treatment. Moreover, because the treated area may already be used by willow flycatchers and

cuckoos and will most likely continue to develop and recover as mid-successional habitat for cuckoos and willow flycatchers, the Forest Service should confer, and perhaps even consult, with the U.S. Fish and Wildlife Service regarding the proposed treatment effects on these species, listed under the Endangered Species Act.

### Comments

1. Fully Explore an Alternative that Prioritizes Manual and/or Mechanical Removal of Tamarisk, Using Herbicides Only as the Secondary Treatment.

The National Environmental Policy Act (NEPA) requires federal agencies to explore all viable alternatives to their proposed action.

The adjacent Audubon Kern River Preserve has been successfully removing invading tamarisk using manual or mechanical control. Audubon uses the following control treatments:

#### **Manual or mechanical control**

- \* Root plowing and cutting—useful for initial removal of heavy infestations; follow-up application of herbicides by a licensed pesticide applicator is suggested to treat resprouting

See: <http://kern.audubon.org/TAMRAM.htm>.



Mechanical removal of Tamarisk.

Here, the use of herbicides is a secondary treatment after manual or mechanical methods have been used. Because they are effective and limit the amount of toxic herbicides used, these methods should be the preferred approach in the proposed treatment area, and the Forest Service should fully explore an alternative that follows these suggestions by Audubon. As further guidance, Exhibit B hereto includes recommendations from the Nature Conservancy for use of manual and mechanical methods of weed control in natural areas (source: <http://www.invasive.org/gist/handbook.html>).

## 2. Analysis of Cumulative Effects from Other Projects

The NEPA analysis must also disclose and fully analyze any cumulative effects from reasonably foreseeable projects. These projects include, but are not limited to: the continued drawdown of Isabella Reservoir, the eventual inundation of the treated area, the possibility that the reservoir will never be refilled, and other uses of the lake-bottom, such as for recreation and endangered species habitat restoration for conservation and recovery of willow flycatchers and cuckoos.

## 3. The Environmental Analysis Must Disclose the Effects from the proposed use of Pathfinder and Hasten Oil, Stalker, and Garlon 4

The NEPA analysis must also disclose the potential adverse effects from any proposed use of herbicides on various resources, including human health, fish, birds, amphibians, mammals, and non-target vegetation, such as willows. At minimum, the NEPA analysis must disclose and analyze impacts from those herbicides and other ingredients listed in scoping notice as “recommended” for this use including Pathfinder and a combination of Hasten Oil (the adjuvant), Stalker (aka. imazapyr), and Garlon 4 (aka. triclopyr).

Attached hereto as Exhibits C through E are chapters of the Nature Conservancy’s “Weed Control Methods Handbook: Tools and Techniques for Use in Natural Area” (available at <http://www.invasive.org/gist/handbook.html>), regarding these herbicides and the adjuvant. The NEPA analysis should address the environmental effects discussed in these chapters. Moreover, the analysis should disclose any best management practices that the operator must follow and discuss any mitigation measures and precautions that will be applied during control, including a spill plan and the proper timing of herbicide application.

## 4. The Environmental Analysis Must Disclose the Project’s Effects on Southwestern Willow Flycatchers and Yellow-billed Cuckoos and their Potential Habitat

Although the Forest Service states in the scoping notice that “[c]urrently the designated Critical Habitat for SW willow flycatcher and proposed Critical Habitat for yellow-billed cuckoo at Isabella Lake are not affected by tamarisk and would not be affected by treatment,” the area proposed treatment area may already provide habitat and may be used by flycatchers and cuckoos as foraging habitat. While the project may not have an effect on designated or proposed “critical habitat,” it may still have an effect on both species, which may be adverse or beneficial. Therefore, the Forest Service must disclose the effects from the proposed treatments on flycatchers and cuckoos and their potential foraging habitat.

5. The Forest Service Should Confer or Consult with U.S. Fish and Wildlife Service Regarding Effects on Willow Flycatchers and Yellow-billed Cuckoos

It follows then that, if there may be an adverse or beneficial effect on flycatchers, cuckoos, or their habitat, a “no effect” determination is not the appropriate call for this project, and the Forest Service must, at least, confer or even consult with the U.S. Fish and Wildlife Service regarding the effects on these listed species under the Endangered Species Act and the applicable regulations.

Please contact the undersigned if you have any questions.

For Sequoia ForestKeeper®, the Kern-Kaweah Chapter of the Sierra Club, and the Center for Biological Diversity.



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