NM Tamarisk/Watershed Plan
New Mexico Department of Agriculture
MSC APR Box 30005
Las Cruces, NM 88003-8005

July 12, 2005

RE: New Mexico State Plan for Non-Native Phreatophyte Removal Comments

Dear Ms. Coleman,

Thank you for this opportunity to comment on the New Mexico Statewide Strategic Plan for Non-native Phreatophyte/Watershed Management Plan, which is currently being developed. We are writing to express our interest and concern, on behalf of our staff and our 1,600 members, in regards to the New Mexico Statewide Strategic Plan for Non-Native Phreatophyte/Watershed Management and are providing comments to address our concerns regarding the implementation of this plan. We wish to continue to be informed about this project and to receive future announcements and documentation with regards to this matter.

The Problem
Tamarisk and other non-native invasive riparian species' success in the West and New Mexico is primarily a result of improper land management caused by human diversion or impoundment of free-flowing water, the control of flood events, and confinement of rivers systems. All of these have led to the loss of natural hydrologic functions, including lowered water tables, reduced surface sediments, narrowed and less sinous floodplains as well as severely limiting the natural re-generation process of native riparian vegetation. In addition, domestic livestock grazing has been a major contributor to the degradation of riparian areas by denuding native riparian vegetation, which allows for the introduction of invasive non-native species to claim a foothold and ultimately dominate riparian systems. Forest Guardians firmly believes that unless these root problems are addressed and management of these ecosystems is changed to align with the natural processes which take place, minimal success will be attained.

Treatment of Current Infestations
The Strategic Plan indicates that a variety of techniques will be used to control these non-native populations, including aerial herbicide application, hand applied application, mechanical removal with herbicide, biological control, hand labor, and mechanical extraction.

We strongly encourage the control of non-native invasive without the use of any herbicide applications.

It is true that herbicides kill weeds, but only at an unacceptable cost to the health of native ecosystems, wildlife, and humans. Forest Service managers must be creative and find new solutions. Forest Guardians requests that all herbicides considered in the Strategic Plan be accompanied by a full and candid discussion of the human health and environmental risks involved, including a discussion both of what scientists know and what scientists do not know with respect to these herbicides.

While conclusions made by the EPA regarding toxicity and ecological impacts are certainly relevant to a toxicity analysis, the agency has an obligation to review other peer-reviewed and widely available literature

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regarding the impacts of herbicides. Such an analysis is required by the Clean Water Act to complete a thorough and legal analysis of environmental impacts, including the cascading effects of multiple and cross-herbicide usage.

We believe a complete analysis must include the direct, indirect, long-term and/or cumulative environmental effects from any herbicide spraying on humans, water (ground and surface), fish, aquatic insects or aquatic plants, sensitive species, including animals, reptiles, insects, plants, soils and soil organisms, and the persistence and effects of the combinations of the herbicides that are proposed to be used.

Wildlife, Sensitive and Protected Species

The Strategic Plan should include an assessment of the impacts to wildlife within treated areas, addressing both the impacts related to the size of treatment area and the corresponding impacts relating to wildlife disturbance. This assessment should include impacts to wildlife habitat when using herbicide, in which treated areas cannot re-vegetated for a minimum of two years, and the impacts of mechanical extraction and other non-herbicide treatments, in which re-vegetation of native riparian species can take place immediately.

Restoration and Eradication

The Strategic Plan should consider the restoration of native riparian species as just as much of a priority as the eradication of the non-native species. Simply treating the non-native species will only lead to the introduction of other non-native species into these systems as well as an ecologically dead zone along areas treated for non-native control. It is important to assess the value that native riparian canopies provide in hindering the establishment of non-native species. In addition, the Strategic Plan should include the impacts of non-native carcasses left after herbicide treatment and their impact in relation to the re-establishment of native riparian species given the toxicity left behind in that organic material.

Overall, Forest Guardians strongly urges a comprehensive plan be developed--one that eradicates non-native invasive riparian vegetation populations, but at the same time promotes the growth of native riparian species and addresses land management decisions which have severely impacted the ecological functionality of the riparian systems in New Mexico. Addressing all of these factors will be the only way to sustain restoration and to control the non-native species within these ecosystems.

Respectfully Submitted,

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