SISKIYOU PROJECT
Siskiyou Regional Education Project—Preserving the Siskiyou for Future Generations of All Species
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See EMC-0486
Same as RMC-0100

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Subject: Draft EIS Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States – Comment Deadline Extension, Supplemental Comments

Dear Mr. Brian Amme

The Siskiyou Project is a conservation advocacy organization based in the Illinois Valley of Southwest Oregon. For future generations of all species, the Siskiyou Project is the grassroots network dedicated to permanently protecting the globally outstanding Klamath-Siskiyou forests and a place we call the Siskiyou Wild Rivers. The Siskiyou Project combines science, education and advocacy to build an inspired and effective local and national constituency for this special place. Thank you for the opportunity to participate Draft EIS comments for the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States. In particular we have many concerns about the use of herbicides.

Please consider the following comments on behalf of Siskiyou Project and Klamath Siskiyou Wildlands Center.

Watershed Health and Aquatic Organisms:

We are concerned that the use of herbicides would be detrimental to the area that we call the Siskiyou Wild Rivers (SWR). SWR is located in SW Oregon within and around the Siskiyou National Forest including adjacent Bureau of Land Management lands. We call this place the SWR because it has the highest concentration of nationally designated Wild and Scenic Rivers between Canada and Mexico on the Pacific Coast. Currently our ground water is among the highest "good" (DEIS, V1, p. 3-83) quality and our watershed surface water quality is rated moderate (DEIS, V1, p. 3-81). Our rivers and streams host some of the last strong holds of wild salmon and steelhead trout.

Specifically, 2,4-D, Dicamba, Glyphosate, and Picloram herbicides are all currently approved for use in Oregon (DEIS p. 2-19). Of these only two are currently approved for use in riparian areas.

> "2,4-D is registered for use in aquatic systems. 2,4-D is a known groundwater contaminant … a maximum concentration level of 0.07 mg/L as a permissible level … concentrations of up to 61 mg/L 2,4-D have been reported immediately following direct application to water … There are conflicting conclusions regarding biodegradation of 2,4-D in aquatic systems" (DEIS, V1, p. 4-27).

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A known groundwater contaminant and conflicting conclusions does not seem to constitute the safety of this chemical being used in or near aquatic systems. "Under the No Action Alternative, it is unlikely that 2,4-D ... would be used ... Based on historic use, 2,4-D ... would constitute approximately 70% of herbicide use" (DEIS, V1, p. 4-32). It is unclear whether or not you intend to use 2,4-D under the preferred alternative. In addition to 2,4-D, Glyphosate is currently approved for riparian use.

> "Glyphosate, which is registered for aquatic use, would be applied to wetland and emergent aquatic vegetation ... it is a known groundwater contaminant ... may stimulate algal growth at low concentration; Austin et al. (1991) have suggested that this could contribute to eutrophication of waterways" (DEIS, V1, p. 4-28).

Because this chemical is also a known groundwater contaminant, it does not seem wise that it should be used in riparian reserves (as defined in the 1994 Northwest Forest Plan). Riparian reserves should not permit the use of herbicides, other means including preventative measures, hand pulling, replanting native vegetation, and fire should be considered.

TABLE 2-6 (DEIS, V1, p. 2-18) "Standard Operating Procedures for Applying Pesticides" to water resources, streams, and wetlands indicates the use of,

> "Appropriate herbicide-free buffer zone for herbicides not labeled for aquatic use based on risk assessment guidance within minimum width of 100 feet for aerial, 25 feet for vehicle, and 10 feet for hand spray application."

"Dicamba can result in groundwater and surface water contamination under conditions that favor such activities ... a known groundwater contaminant, and has a high potential to leach into groundwater" (DEIS, V1, p. 4-29). "Picloram can move off-site through surface or subsurface runoff, and has been detected in the ground water of 11 states ... Concentrations in runoff are often reported to be adequate to prevent the growth of non-target terrestrial and aquatic plants" (DEIS, V1, 4-31). Because of the risk of contamination of our surface waterways and ground water from surface runoff, the buffers (mentioned above) do not seem adequate in protecting our watersheds. Herbicide treatments of any kind should reflect a 150 foot buffer for all channels including intermittent ones, (this figure is determined in the Northwest Forest Plan for riparian reserve protection from logging and other ground disturbing activity to ensure the least amount of surface runoff and this figure should honor the use of herbicides too as the loss of vegetation often leads to surface runoff) or a site specific tree length which ever is greater.

In addition, aerial application should be prohibited. "Herbicide particles could be transported long distances from the target location, depending on weather conditions" (DEIS, p. 4-5 & 4-6). The risk of spray drift from aerial application poses too much risk of uncertainty and potential to contaminate waterways in addition to non-target species and human health.

The Salmonid family of native fish (including Salmon and Trout, special to the Siskiyou Wild Rivers area) are the most ecologically, culturally, and commercially important to this area. "Treatments could adversely affect the health and survivorship of aquatic organisms, and indirectly impact these organisms through impacts to habitat ... Fish harmed or killed, and habitat productivity lost, from treatment would be irreversible" (DEIS, V1, p. 2-31). Removal of vegetation along streams could contribute to increased erosion, increased water temperatures from loss of habitat shade, and reduction in surface water quality.

Our clean ground and surface water is part of what makes the Siskiyou Wild Rivers area special. Our water sources provide safe drinking water, wildlife and fish habitat, and a place for people to recreate. Such a naturally clean resource is priceless and must not be subject to the risk of chemical contamination.

Soil, Terrestrial Wildlife, Flora and Forests:

We are concerned that the use of herbicides would be harmful to the special and unique species of the Siskiyou Wild Rivers area. This area is naturally born of fire and fire (when applied during the appropriate seasons for native flora enhancement) may be the best way to maintain the natural ecosystem and native species.

Southwest Oregon is comprised of varied soil types that range from more traditional productive soils, to serpentine influenced soils. In particular the serpentine influenced soils are low in nutrients and harbor a very unique and adapted species of plant. "Herbicides may ... adversely affect soil microorganisms and macroorganisms, leading to poorer soil productivity" (DEIS, p. 4-16). Serpentine influenced area should not consider be considered for the use of herbicide treatments. The Siskiyou Wild Rivers area ranks competitively in the international realm as number one for biological diversity.

Characteristic of the Siskiyou Wild Rivers area and our unique serpentine influenced landscape, "the combination of hydrologic characteristics, steep topography, and slow vegetative growth make soil erosion a serious concern" (DEIS, p. 4-10) and could lead to contamination of waterways as well as non-target species should herbicides be used. In addition, soil may be adversely affected through the use of herbicides and vegetation loss. "As vegetation is removed, there is less plant material to intercept rainfall and less to contribute organic material to the soil. Loss of plant material and soil organic matter can increase the risk of soil susceptibility to wind and water erosion" (DEIS, p. 4-16). Hand pulling first, and if necessary followed with manual spot application of herbicide would minimize unwanted vegetation loss and damages to soil microorganisms. Weed treatments should always be followed with native revegetation.

Herbicides pose the risk of harming non-targeted species and great caution should be taken when considering their use as a final resort to noxious weed control. Herbicides that enter waterways can travel and effect non-targeted species. "[2,4-D] is known that concentrations as low as 0.22 mg/L can damage sensitive plants" (DEIS, V1, p. 4-27). Chemicals that bind well to location should be considered over other chemicals. "[Glyphosate is] unlikely to enter waters through surface runoff or subsurface flow because it binds strongly to soils" (DEIS, V1, p. 4-28). However, "Glyphosate is non-selective, so it must be used carefully around desirable and non-target plants" (DEIS, V1, p. 2-8). In areas where there are sensitive native plants and non-target plants, methods other than herbicides may be preferable such as hand pulling and fire. Manual spot application of herbicides may be the last resort method of choice when all other preventative measures and noxious weed control measures fail.

In addition, 2,4-D, Dicamba, Glyphosate, and Picloram herbicides are all currently approved for aerial or ground application (DEIS, V1, p. 3-67). "Herbicide particles could be transported long distances from the target location, depending on weather conditions" (DEIS, p. 4-5 & 4-6). The risk of spray drift from aerial application poses too much risk of uncertainty and potential to contaminate non-target, native species, waterways and human health. The use of herbicides should only be considered for ground application and aerial application should be prohibited.

The DEIS claims that herbicides will restore wildlife habitat and forest health are false.

> "Over three-quarters of treatments in the Mediterranean and Marine Ecoregions would occur in evergreen forestlands. Much of these efforts would be focused on integrated weed management and forest health. The objectives of forest health treatments would be to stem the decline in old forests habitats primarily due to fire exclusion, to restore more natural fire regimes and reduce hazardous fuels to reduce the potential for catastrophic wildfires, and to restore forests recently burned by wildfires ... Herbicides can be effective in improving forest wildlife habitat by 1)

reducing population of invasive exotic plants, 2) creating snags and downed woody material, 3) maintaining patches of early-successional vegetation within late-successional communities, and 4) maintaining woody and herbaceous plant communities for browsing species" (DEIS, V1, p. 4-111).

Much of the Siskiyou Wild Rivers area burned in the Biscuit Fire of 2002. The result was a healthy burn and a naturally recovering ecosystem. Following the fire, woodpeckers and snag dependent species began returning by the droves. The understory began sprouting with native vegetation and young conifer seedlings. It was wrong that the Forest Service and BLM determined a need for post-fire logging. The logging that has taken place has only set back recovery of this burned landscape for generations to come if indefinitely in some areas. In addition activities such as logging have the potential to spread weed seeds.

Herbicides could harm wildlife species. The Siskiyou Wild Rivers area currently has browsing population of Elk and Deer both of which could have better population numbers. "Terrestrial herbicides with the greatest likelihood of affecting special status wildlife species, via any exposure pathway, include 2,4-D ... which pose moderate to high risks to special status terrestrial wildlife at the typical application rate, under on or more exposure scenarios" (DEIS, p. 4-91). Care should be taken to avoid the use of herbicides during high use wildlife seasons such as nesting spotted owl seasons. In addition, herbicides should not be used in known spotted owl cores or in habitat of other sensitive or late-successional dependent species.

Hand pulling and native vegetation planting can help to restore the landscape damaged by logging while also creating health friendly jobs for the people. The Biscuit Fire as well as the Deer Creek Fire of 2005 (BLM lands, the fire originated on private property and BLM should work with private land-owners to fire safe their immediate home surroundings.) have left behind much snag forests, that it is not necessary to deliberately create more snags via herbicides. If more snags are necessary in some areas, such as meadow restoration, girdling trees is a far safer means than applying herbicides "to trees around the circumference of the trunk ... or to cuts in the trunk" (DEIS, V1, p.2-8). In addition, because of the large amounts of burned landscape in southwest Oregon, not to mention the growing number of clearcuts, there is plenty of early-successional vegetation within late-successional communities. Projects such as BLM's Althouse-Sucker Landscape Management Plan should not enter the LSR portions of the project planning. In addition, within the past year, the Siskiyou National Forest Service proposed herbicide treatment for weed control at a place called Onion Camp. The local residents created enough controversy as to turn the tables back to adequate attempts at hand pulling and non-chemical method of weed control.

Passive restoration needs to take place, stop the logging and reduce the grazing cattle among other things. "Prevention and early detection is the cheapest and most effective wed control method. Prevention and early detection strategies that reduce the need to vegetative treatments for noxious weeds could lead to a reduction in the number of acres treated for noxious weeds in the future by reducing or preventing their establishment" (DEIS, p. 2-16). In addition, "There are several drawbacks and limitations to herbicide use ... Weeds may develop a resistance to a particular herbicide over time" (DEIS, p. 2-14) and therefore chemical treatment should only be considered as a very last resort.

Human Health:

Herbicides are known to be toxic not only to wildlife and plants, but they can also be life threatening to human health causing cancer among other illnesses and disease. Because the Siskiyou Wild Rivers area hosts one of the highest concentrations of Nationally designated wild & scenic rivers and is world

renowned for biodiversity, it is also a hot spot for recreationists. Chemical treatments pose risks to local residents and recreationists. "Based on the HHRA ... risk is moderate to high for drinking water if treated with 2,4-D" (DEIS, p. 4-22). "Aerial applications of herbicides pose a greater risk to the public due to off-site drift than ground applications, as herbicides applied at greater distances from the ground are able to drift farther from the target application area" (DEIS, p. 4-134 & 4-135). Aerial applications should be prohibited. In addition herbicides can "contaminate groundwater or run off into water bodies used by recreationists" (DEIS, p. 4-119) and can contaminate resources that are gathered for consumption such as mushrooms, berries, or fish.

Amphibians:

We are very concerned about impacts from herbicides on amphibians as described in the publication attached below (**The Impact of Insecticides and Herbicides on the Biodiversity and Productivity of Aquatic Communities by RICK A. RELYEA Ecological Applications v.15, n.2 1apr 2005).** We are particularly concerned about impacts to plethodon salamanders in the Klamath Mountains area of Southwest Oregon.

http://www.mindfully.org/Pesticide/2005/Roundup-Aquatic-Communities1apr05.htm

The Impact of Insecticides and Herbicides on the Biodiversity and Productivity of Aquatic Communities

RICK A. RELYEA /

Ecological Applications v.15, n.2 1apr2005

[More on **Roundup** | **Response to Monsanto's Concerns on this Study** by Dr. Relyea 1apr2005]

Abstract. Pesticides constitute a major anthropogenic addition to natural communities. In aquatic communities, a great majority of pesticide impacts are determined from single-species experiments conducted under laboratory conditions. Although this is an essential protocol to rapidly identify the direct impacts of pesticides on organisms, it prevents an assessment of direct and indirect pesticide effects on organisms embedded in their natural ecological contexts. In this study, I examined the impact of four globally common pesticides (two insecticides, carbaryl [Sevin] and malathion; two herbicides, glyphosate [Roundup] and 2,4-D) on the biodiversity of aquatic communities containing algae and 25 species of animals.

Species richness was reduced by 15% with Sevin, 30% with malathion, and 22% with Roundup, whereas 2,4-D had no effect. Both insecticides reduced zooplankton diversity by eliminating cladocerans but not copepods (the latter increased in abundance). The insecticides also reduced the diversity and biomass of predatory insects and had an apparent indirect positive effect on several species of tadpoles, but had no effect on snails. The two herbicides had no effects on zooplankton, insect predators, or snails. Moreover, the herbicide 2,4-D had no effect on tadpoles. However, Roundup

completely eliminated two species of tadpoles and nearly exterminated a third species, resulting in a 70% decline in the species richness of tadpoles. This study represents one of the most extensive experimental investigations of pesticide effects on aquatic communities and offers a comprehensive perspective on the impacts of pesticides when nontarget organisms are examined under ecologically relevant conditions.

Key words: amphibian decline; Anax junius; Bufo americanus; Daphnia; Dytiscus; *frogs;* Hyla versicolor; Lestes; Pseudacris crucifer; Rana pipiens; Rana sylvatica; Tramea.

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Key words: amphibian decline; *Anax junius*; *Bufo americanus*; *Daphnia*; *Dytiscus*; frogs; *Hyla versicolor*; *Lestes*; *Pseudacris crucifer*; *Rana pipiens*; *Rana sylvatica*; *Tramea.*
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INTRODUCTION

A central goal of ecology is to understand patterns of species abundance and diversity in communities and ecosystems. A great deal of research has documented the patterns of biodiversity and productivity using relatively pristine systems or experimental mesocosms that approximate natural systems (Tilman et al. 2001, Chase and Leibold 2002, Downing and Leibold 2002, Naeem 2002). However, many ecosystems are far from pristine due to a variety of anthropogenic influences, including exposure to a plethora of pesticides (Harris et al. 1998, McConnell et al. 1998, LeNoir et al. 1999, Sparling et al. 2001, Davidson et al. 2002). Herbicides and insecticides have the potential to cause dramatic changes in natural communities, yet our knowledge of pesticide effects on natural communities is largely limited to cases in which pesticides have been intentionally or accidentally applied to natural sites with subsequent floral and faunal surveys (e.g., reptiles and amphibians, Lambert [1997]; macroinvertebrates, Leonard et al. [1999]; plankton and fish, Favari et al. [2002]). In contrast, experimental efforts to understand community effects have primarily used single pesticides and have focused on a narrow range of taxonomic groups including zooplankton (Hanazato and Yasuno 1987, 1989, 1990, Havens 1994, 1995) and larval amphibians (e.g., Boone and Semlitsch 2001, 2002; but see Boone and James 2003). The challenge is to combine the best of both approaches by examining the impact of different pesticides on a broad diversity of taxa while taking advantage of the power that comes from experimental replication.

Aquatic communities are particularly well suited to experimental investigations of pesticide effects. There is a long history of using outdoor aquatic mesocosms to create experimental communities that can be replicated and manipulated (Morin 1981, Werner and Anholt 1996, Relyea and Yurewicz 2002, Downing and Leibold 2002). Mesocosms offer the potential to assemble diverse communities of predators, herbivores, and producers and make testable predictions about the impact of pesticides based on single-species laboratory tests (i.e., LC50 tests that estimate the lethal concentration necessary to kill 50% of a test population). For example, in pond communities, one would predict that the application of insecticides at realistic concentrations should have a direct lethal impact on aquatic insect predators, but no direct impact on herbivores or producers. However, insecticides may cause trophic cascades including indirect positive effects on the herbivores and indirect negative effects on the resources. In contrast, herbicides might have a direct negative impact on producers but no direct impact on herbivores or predators. However, herbicides may cause trophic cascades including indirect negative effects on herbivore biomass and predator biomass (Diana et al. 2000). In summary, mesocosms allow

investigators to examine the impacts of relevant pesticide concentrations using realistic population densities, reasonable time scales, and relatively natural conditions.

In this study, I assembled diverse communities in outdoor aquatic mesocosms and then examined the impact of two insecticides and two herbicides (applied separately) on the diversity of the communities as well as the survival and biomass of each taxon in the community. Based on the known impact of these pesticides, I tested the following hypotheses. (1) All of the pesticides will reduce overall biodiversity. (2) The insecticides will reduce the diversity and abundance of insects (USDI [U.S. Fish and Wildlife Service] 1980) and zooplankton (Havens 1994, 1995), but will have no direct impact on the snails and tadpoles (Relyea 2003*b*, 2004). (3) Because of the reduction of insect predators, the insecticides will have an indirect positive effect on the biomass of herbivores and an indirect negative effect on the biomass of producers (i.e., periphyton). (4) The herbicides will reduce the biomass of producers but will have no direct impact on the snails and tadpoles. (5) Because of the reduction of producers, the herbicides will have an indirect negative effect on the biomass of herbivores and predators.

Pesticide background

The four pesticides used in the experiment were two insecticides (carbaryl and malathion) and two herbicides (2,4-D and glyphosate). Carbaryl and malathion are both broad-spectrum insecticides that kill by inhibiting acetylcholine esterase. In the United States, 1– 2 X 10^6 kg of carbaryl (commercial name: Sevin) are applied to rangelands, forests, oceans, homes, gardens, and 1.3 X 10^6 ha of crops (Donaldson et al. 2002); see the online National Pesticide Use Database.[2] The half-life for carbaryl depends on pH and ranges from 0.1 days to 4 years (Aly and El-Dib 1971, Wauchope and Haque 1973). Malathion is applied to >800 000 ha of cropland including fruits, vegetables, and cotton at an annual amount of 14–16 X 10^6 kg (Donaldson et al. 2002, National Pesticide Use Database [footnote 2]), and is a preferred insecticide for combating the mosquitoes that carry malaria and West Nile virus. The half-life of malathion is 2–26 days, depending on pH (Guerrant et al. 1970, Wang 1991). Glyphosate (commercial names: Roundup, Rodeo) is a broad-spectrum herbicide that kills plants by inhibiting the synthesis of essential amino acids. The most popular formulation, Roundup, actually is a combination of the active ingredient (glyphosate) and a surfactant that helps the herbicide to penetrate plant leaves (polyehtoxylated tallowamine; POEA). It is the second most commonly applied herbicide in the United States, with 38–43 X 10^6 kg of active ingredient applied to homes, gardens, forests, wetlands, and 8.2 X 10^6 ha of cropland in the United States (Donaldson et al. 2002, National Pesticide Use Database). The half-life of roundup is 7–70 days (Giesy et al. 2000). The herbicide 2,4-D is a broadleaf herbicide that operates as a growth regulator by altering proper cell division in plants. It is widely used in agriculture, with 24–28 X10^6 kg applied to nearly 33 X 10^6 ha (Donaldson et al. 2002, National Pesticide Use Database). The half-life of 2,4-D is from 10 to >50 days, according to NIH data *(available online).*[3] These four pesticides are among the top 10 pesticides used in the United States for agriculture and home use (Donaldson et al. 2002), and all of them are either applied directly to aquatic habitats or can make their way into aquatic habitats via unintentional overspray, aerial drift, or runoff.

[2] (http://www.ncfap.org)

METHODS

The experiment was a completely randomized design with five pesticide treatments that were each replicated six times for a total of 30 experimental units. The experimental units were 1200-L polyethylene tanks that were filled with 1000 L of well water during 26–28 April 2002. On 6 May, I added 300 g of dry leaves *(Quercus* spp.) and 25 g of rabbit chow to serve as habitat structure and an

initial nutrient source. I also added an aliquot of zooplankton and phytoplankton that was a mixture from six local ponds. On 23 May, I placed two 10 X 10 cm ceramic tiles in each tank (oriented vertically) to serve as future estimates of periphyton growth in each tank.

Five days later, I began adding macroorganisms that I collected from natural habitats, either as mixtures of 10 egg masses that were previously hatched in wading pools (four of the five tadpole species), or as larvae and adults dip-netted from ponds and wetlands (Table 1). On 28 May, I added five species of larval anurans, two species of snails, and one species of larval damselfly (predators on zooplankton). The following day, I added a third snail species. On 30 May, I added the remaining predators: larval *Anax* and *Tramea* dragonflies (predators on both tadpoles and snails), larval *Dytiscus* and *Acilius* beetles (predators on tadpoles and zooplankton, respectively), *Notonecta* and *Belostoma* hemipterans (predators on both tadpoles and snails), and recently hatched spotted salamander larvae (predators on zooplankton). All of these species naturally coexist and, for each species, I used densities that were within the range of natural densities based on seven years of quantitative surveys of natural aquatic habitats (R. A. Relyea, E. E. Werner, D. K. Skelly, and K. L. Yurewicz, *unpublished data).*

[3] (http://toxnet.nlm.nih.gov)

TABLE 1. A list of the taxa used in the experiment.

Common name	Species	Size	Density†	Trophic level
Spotted salamander‡	Ambystoma maculatum	49 ± 3 mg	2	predator
Diving beetle‡	Dytiscus sp.	28 ± 1.1 mm	1	predator
Diving beetle‡	Acilius semisulcatus	21 ± 0.4 mm	1	predator
Dragonfly‡	Anax junius	39 ± 0.9 mm	1	predator
Dragonfly‡	Tramea sp.	23 ± 0.6 mm	1	predator
Damselfly‡	Lestes sp.	15 ± 0.3 mm	1	predator
Backswimmer	Notonecta undulata	10 ± 0.3 mm	3	predator
Water bug	Belostoma flumineum	20 ± 0.2 mm	1	predator
Wood frog‡	Rana sylvatica	104 ± 10 mg	10	herbivore
Leopard frog‡	Rana pipiens	42 ± 8 mg	10	herbivore
American toad‡	Bufo americanus	45 ± 5 mg	10	herbivore
Gray tree frog‡	Hyla versicolor	4 ± 0 mg	10	herbivore
Spring peeper‡	Pseudacris crucifer	214 ± 16 mg	10	herbivore
Snail	Physa integra	62 ± 4 mg	10	herbivore
Snail	Helisoma trivolvis	434 ± 31 mg	10	herbivore
Snail	Stagnicola elodes	177 ± 20 mg	10	herbivore
Cladoceran	Daphnia pulex	···	···	zooplankton
Cladoceran	Daphnia ambigua	···	···	zooplankton
Cladoceran	Daphnia longiremis	···	···	zooplankton
Cladoceran	Ceriodaphnia sp.	···	···	zooplankton
Cladoceran	Scapholebris sp.	···	···	zooplankton
Copepod	Eurytemora affinis s	···	···	zooplankton
Copepod	Eurycyclops agilis	···	···	zooplankton
Copepod	Mesocyclops edax	···	···	zooplankton
Copepod	Leptochaptumorus siciloides	···	···	zooplankton

Notes: Standard length was used as an initial size measure for the aquatic insects, whereas mass was used as an initia

size measure for amphibians and snails. Values are means ± 1 SE. The tadpoles and snails are herbivores on periphyton, whereas the zooplankton are herbivores on phytoplankton.

† Density is the number of individuals per 1000-L experimental tank.

‡ Larval stages were used in the experiment.

There were five pesticide treatments: controls (250 mL of water added), carbaryl, malathion, glyphosate, or 2,4-D. For all four chemicals, I wanted to simulate the impact of a direct overspray on a wetland. Thus, I purchased commercial forms of each chemical and had the concentrations of each chemical's active ingredient independently confirmed by the Mississippi State Laboratory (Mississippi State, Mississippi, USA) using high-pressure liquid chromatography (carbaryl, 22.3%; malathion, 50.6%; 2,4-D, 44.5%; glyphosate, 25.2%). Based on the surface area of the cattle tanks (2.41 m^2), I applied each chemical at the manufacturer's recommended maximum application rates (Sevin, 0.955 mL/ m^2; malathion, 0.234 mL/m^2; 2,4-D, 0.117 mL/m^2; Roundup, 6.4 mL/m^2). Thus, I added 2.3 mL of Sevin, 0.6 mL of malathion, 0.3 mL of 2,4-D, and 15.3 mL of Roundup. Because the tanks contained 1000 L of water, these application rates translated to 0.51 mg carbaryl/L, 0.32 mg malathion/L, 0.12 mg 2,4-D/L, and 3.8 mg glyphosate/L. The pesticides were added immediately after all taxa had been added to the tanks (30 May).

On 12 June, the experiment was terminated. I began by first sampling the zooplankton using a 0.2-L tube sampler that was plunged into the tanks in the center and at each of the four cardinal directions. The five samples were combined and filtered through 62- μm Nitex screening (Small Parts, Miami, Florida, USA). All zooplankton were preserved in 70% ethanol and subsequently counted and identified to species. Next, the ceramic tiles were removed and the periphyton was scrubbed (using toothbrushes) onto oven-dried, pre-weighed filter paper. The algae-covered filters were oven-dried again for 15 h at 80° C and then weighed to determine the dry mass of algae on each tile. Finally, the tanks were drained and all macroorganisms were sorted from the leaves, counted, and weighed. Amphibians were preserved in 10% formalin and invertebrates were preserved in 70% ethanol.

Statistical analyses

I analyzed the data using ANOVAs. The first t analysis examined the impact of the pesticides on total species richness of the animals in the community using a one-way ANOVA. The second analysis examined species richness and biomass of the four major functional groups: predators (insects and salamanders), large herbivores (snails and tadpoles), zooplankton, and periphyton algae (algae was not separated into species). The third set of analyses examined the abundance of individual species within each of the three animal groups (predators, large herbivores, and zooplankton). Because much of these latter data contained heterogeneous errors (some treatments had 0% survival), I first t ranked the data and then conducted a MANOVA on the ranked values. When I found a significant multivariate effect, I conducted univariate analyses. When I found significant univariate effects, I conducted mean comparison tests using Fisher's test. I weighed all animals coming out of the tanks at the end of the experiment and found no significant treatment effects on mass for any of the taxa ($P > 0.05$), so I chose to not include the mass data in the analysis. Thus any differences in biomass among treatments simply reflect differential survival across treatments. Two of the tanks developed an unusual red periphyton that was not present in any other tanks in the experiment (and had not been observed in dozens of previous mesocosm experiments). Both tanks had been randomly assigned the control treatment and both were removed from the analysis.

RESULTS

The first analysis examined the impact of the pesticides on the species richness of all animal taxa in the communities (Fig. 1). There was a significant impact of pesticides on total animal richness ($F_{4,23} = 10.1$, $P < 0.001$). Compared to the control tanks, species richness was 15% lower with Sevin ($P = 0.041$), 30% lower with malathion ($P < 0.001$), and 22% lower with Roundup ($P = 0.005$). The addition of 2,4-D had no effect ($P = 0.543$).

The analysis of species richness and biomass by functional group produced a significant multivariate effect (Wilks' $F_{28,63} = 5.5$, $P < 0.001$; Fig. 1). The richness of predators, large herbivores (tadpoles and snails), and zooplankton were all affected by the treatments ($P < 0.001$). Predator richness declined with Sevin and malathion ($P < 0.03$), but not with 2,4-D or Roundup ($P > 0.35$). Large-herbivore richness decreased with Roundup ($P < 0.001$), but was not affected by the other three pesticides ($P > 0.7$). The richness of zooplankton declined significantly with Sevin ($P = 0.044$) and malathion ($P = 0.008$), but not with 2,4-D or Roundup ($P > 0.3$).

The biomass of predators, large herbivores, zoo-plankton, and periphyton also differed among treatments (univariate tests; $P < 0.03$; Fig. 2). Predator biomass was lower with Sevin, malathion, and Roundup ($P < 0.001$), but not with 2,4-D ($P = 0.406$). The biomass of the large herbivores was higher with Sevin ($P = 0.039$), unaffected by malathion and 2,4-D ($P > 0.25$), and lower with Roundup ($P = 0.024$). The abundance of zooplankton was not different between the control tanks and the four pesticide treatments ($P > 0.09$). Periphyton biomass was unaffected by Sevin, malathion, and 2,4-D ($P, > 0.15$), but was 40% greater with Roundup ($P = 0.028$).

In the remaining analyses, I examined the impact of pesticides on the survival of each species in the three functional groups. In the MANOVA on predator species, I found a significant multivariate effect of the pesticides (Wilks' $F_{28,63} = 2.5$, $P = 0.002$; Fig. 3). There were no pesticide effects on the survival of *Anax junius* dragonflies, water bugs *(Belostoma flumineum),* or damselflies *(Lestes* sp.) (univariate test, P > 0.25); marginally significant effects on the survival of *Dytiscus* beetles (univariate test, P = 0.081); and significant effects on the survival of *Tramea* dragonflies, back-swimmers *(Neonecta undulata),* and spotted salamanders *(Ambystoma maculatum)* (univariate test, $P < 0.03$). *Dytiscus* beetles were eliminated with Sevin and malathion ($P = 0.054$), whereas *Tramea* dragonfly survival was reduced with malathion ($P = 0.016$) and nearly reduced with 2,4-D ($P = 0.065$). Backswimmer survival was increased with 2,4-D ($P = 0.035$), whereas spotted salamander survival was marginally higher with Sevin ($P = 0.075$) and significantly higher with *2,4-D* ($P = 0.011$). No diving beetle *(Acilius semisulcatus)* larvae survived in any of the tanks.

FIG. 1. The impact of four different pesticides on the species richness of predators (insects and spotted salamanders), large herbivores (tadpoles and snails), and zooplankton in aquatic mesocosm communities. Data are means ± 1 SE.

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FIG. 2. The impact of four different pesticides on the biomass (or abundance) of predators (insects and spotted salamanders), large herbivores (tadpoles and snails), zooplankton, and periphyton in aquatic mesocosm communities. Data are means ± 1 SE.

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FIG. 3. The impact of four different pesticides on the survival of individual species of predators (insects and spotted salamanders). Data are means ± 1 SE.

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FIG. 4. The impact of four different pesticides on the abundance of individual species of zooplankton. Data are means ± 1 SE.

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FIG. 5. The impact of four different pesticides on the survival of individual species of herbivorous tadpoles. Data are means ± 1 SE.

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In the MANOVA on zooplankton species, there was a significant multivariate effect of pesticides (Wilks' $F_{36,58} = 3.4$, $P < 0.001$). In univariate tests, there was no effect of the pesticides on *Daphnia longiremis, Ceriodaphnia* sp., *Scapholebris* sp., *Eurycyclops* sp., or *Leptochaptumorus* sp. *(P > 0.1).* However, there were significant impacts on *Daphnia pulex, Daphnia ambigua, Eurytemora* sp., and *Mesocyclops* sp. *(P* < 0.02; Fig. *4). Daphnia pulex* was completely absent from tanks with Sevin or malathion *(P* < 0.001). *Daphnia ambigua* showed a similar pattern, although the effects of Sevin and malathion were not significantly different from the controls *(P* = 0.063 and *P* = 0.136, respectively). *Eurytemora* was more abundant with Sevin and malathion *(P* 0.03), but nearly absent with Roundup *(P* = 0.028). *Mesocyclops* was more abundant with Sevin *(P* = 0.021), but was unaffected by the other pesticides.

In the MANOVA on the large herbivores, I found a significant multivariate effect of the pesticides (Wilks' $F_{32,61} = 2.9$, $P < 0.001$). There was no effect of pesticides on any of the three snail species (univariate tests, $P > 0.1$). Across all treatments, the mean survival (1 SE) was 3 ± 1% for *Physa integra, 24* ± 4% for *Stagnicola elodes,* and 61 ± 3% for *Helisoma trivolvis.* Among the tadpoles, there were significant impacts of pesticides on leopard frogs *(Rana pipiens),* wood frogs *(R. sylvatica),* and gray tree frogs *(Hyla versicolor)* (univariate tests, $P < 0.01$; Fig. 5) but no impacts on toads *(Bufo americanus)* or spring peepers *(Pseudacris crucifer) (P >_* 0.09). Leopard frog survival improved from 28% to 58% with Sevin *(P* = 0.037) and 28% to 43% with malathion, but the latter effect was not significant *(P* = 0.391). Leopard frogs were completely exterminated with Roundup *(P* = 0.004). Gray tree frog survival was unaffected by the insecticides, but gray tree frogs were eliminated with Roundup *(P* = 0.003). Wood frog survival improved from 50% to 72% with Sevin *(P* = 0.054) and 50% to 67% with malathion, although the latter effect was not significant *(P* = 0.194). Wood frog survival was reduced to only 2% with Roundup *(P* = 0.012). None of the species was affected by 2,4-D *(P* > 0.5).

DISCUSSION

The results of this study indicate that pesticides can have profound impacts on the diversity and productivity of aquatic communities over relatively short time scales (two weeks). However, the impacts on the communities were very pesticide specific. . As expected, the two insecticides reduced the diversity and biomass of the insect predators, completely exterminating *Dytiscus* beetles and reducing the abundance of *Tramea* and backswimmers (the latter was only reduced with malathion). This effect was predictable from the large literature on the susceptibility of aquatic insects and crustaceans to carbaryl and malathion. The $LC50_{72\text{-}96\ h}$ values range from 0.005 to 0.026 mg/L for carbaryl (USDI 1980) and 0.005 to 0.18 mg/L for malathion (USDI 1980, Key et al. 1998, Leight and Van Dolah 1999).

Interestingly, the two insecticides had no effect on two of the insect species *(Anax* dragonflies and water bugs; few damselflies survived in any of the treatments, making it difficult to draw any firm conclusions), suggesting that insects vary in their susceptibility to the insecticides (when applied at these recommended rates). In other words, the insecticides did not eliminate the entire insect community. Thus, although predation from aquatic insects can be reduced with the application of insecticides, major

predators such as *Anax* dragonflies (Relyea 2001, 2003*a*) will continue to consume prey (although pesticide effects on the foraging behavior of these predators are unknown).

In addition to the effects on insects, the insecticides also affected the zooplankton by eliminating cladocerans while favoring copepods. The change in zooplankton community composition with acetylcholine esterase-inhibiting insecticides is in accord with a number of previous studies. At higher concentrations (1 mg/L), carbaryl (the active ingredient of Sevin) can completely wipe out nearly all species of zooplankton. However, under lower concentrations, such as those used in the current study, carbaryl only eliminates cladoceran zooplankton. As a result, the phytoplankton resource can increase and provide an indirect, positive effect on the abundance of grazing copepods (copepod body size also may have increased, but this was not measured). However, copepods typically cannot graze the smallest algae that are consumed by the cladocerans; hence, the copepod populations are unable to completely compensate for the decrease in cladoceran abundance (Hanazato and Yasuno 1990, Hanazato 1991, Havens and Hanazato 1993, Havens 1994, 1995, Wong et al. 1995). Thus, it appears that these two insecticides can have both direct and indirect effects on zooplankton.

At the concentrations used, the insecticides were predicted to have no direct negative effects on the survival of the large herbivores (snails and tadpoles). There appear to be very few comparative data addressing the impacts of carbaryl and malathion on snails (Martinez-Tabche et al. 2002), but the current study suggests minimal impacts. In contrast, we have a large number of studies on the impacts of carbaryl and malathion on tadpoles. The LC50 for carbaryl ranges from 1 to 18 mg/L (Marchal-Segault 1976, Marian et al. 1983, Bridges 1997, Zaga et al. 1998, Relyea and Mills 2001, Relyea 2003*b*) for all amphibians and from 1.2 to 3.4 mg/L for the populations of wood frogs, leopard frogs, toads, and gray tree frogs used in the current study (Relyea [2003b]; including LC50 estimates when Sevin is combined with predator chemical cues). The LC50 values for malathion range from 1.2 to 5.9 across all amphibians, including the populations of wood frogs, leopard frogs, toads, and gray tree frogs used in the current study (Fordham et al. 2001, Relyea 2004). Because the current study used concentrations of carbaryl and malathion that were well under these LC50 values(0.51 and 0.32 mg/L, respectively), there should have been minor negative impacts of insecticides on tadpole survival and this is what I observed.

Interestingly, the survival of tadpoles actually inscreased with the addition of insecticides; this was probably an indirect effect of high predator mortality. The addition of Sevin reduced the biomass of the insect predators by 44%, increased tadpole (wood frog and leopard frog) survival by 22–30%, and increased total tadpole biomass by 85%. Similarly, the salamander larvae (which were small and susceptible to insect predation) experienced a 37% increase in survival when Sevin was added. While the addition of malathion reduced the biomass of the insect predators by a similar amount as Sevin (48%), the 15–17% increase in wood frog and leopard frog survival was not significant and the salamander survival was unchanged. Thus, changes in predator biomass do not completely explain changes in herbivore survival, suggesting that we also need to examine how the different pesticides affect the foraging behavior of the surviving predators. For example, Boone and Semlitsch (2001, 2002) found that carbaryl (in the absence of insect predators) can have both positive and negative effects on tadpole survival. In contrast to the tadpoles, snails did not experience a positive indirect effect on their biomass because the specialist snail predator *(Belostoma)* was not killed by the insecticides. This suggests that although higher concentrations of carbaryl and malathion certainly can kill many amphibians (5 mg/L; Boone and Semlitsch 2001, 2002, Relyea 2003*b*, 2004), under lower concentrations these insecticides, and perhaps other insecticides that share the same mode of action, actually can have positive indirect effects on the survival and biomass of tadpoles. Thus, in assessing the impacts of insecticides on amphibians, it is critical that we consider both relevant concentrations and relevant ecological contexts.

The two herbicides had very different effects on the community than the two insecticides. Although glyphosate and 2,4-D are designed to kill plants, they did not reduce the biomass of periphyton in the experiment. In fact, 2,4-D had few effects on any species or trophic group in the entire community during the 14-day experiment (only backswimmers and spotted salamanders increased survival with 2,4-D, although the causes are unclear). This general lack of impact from 2,4-D is consistent with past toxicity studies that have found relatively high $LC50_{96\text{-}h}$ values for 2,4-D, including 45 mg/L for lake trout *(Salvelinus namaycush),* 301 mg/ L for American eels *(Anguilla rostrata),* and 363–389 mg/L for cladocerans *(Daphnia magna;* USDI 1980, Verschueren 1983). In this system, 2,4-D appeared to have no substantial impact on a diverse aquatic community.

In stark contrast, Roundup had a major effect on the community. Roundup reduced tadpole richness by 70% by completely exterminating two species (leopard frogs and gray tree frogs) and nearly exterminated a third species (wood frogs). Roundup did not have a significant effect on toads, spring peepers, and the spotted salamanders, although few toads survived even in the control treatments, making it difficult t to assess the effects of Roundup on survival. These reductions in tadpole survival were concomitant with a decrease in predator biomass, suggesting that Roundup also caused a trophic cascade from the herbivores to the predators. In comparison to the 3.8 mg/L of glyphosate used in the mesocosm study (based on the manufacturer's recommended application rate; AI = active ingredient), concentrations of glyphosate in nature have been observed up to 2.3 mg AI/L and are capable of being as high as 3.7 mg AI/L (Giesy et al. 2000).

Giesy et al. (2000) recently reviewed the toxicity of glyphosate and found that its toxicity (expressed as mg of active ingredient per liter) to invertebrates can be quite high, ranging from 3.5 mg AI/L in crayfish *(Orconectes nais;* $LC50_{96\text{-}h}$) to 5600 mg AI/L in midge larvae *(Chironomus riparius;* $LC50_{48\text{-}h}$). As expected from these previous studies, glyphosate had no effect on the insect predators and snails in the mesocosm experiment. Glyphosate also has a wide range of toxic effects on fish, ranging from 3.5 mg AI/L in *Tilapia* sp. ($LC50_{96\text{-}h}$) to >1300 mg AI/L in sheepshead minnows *(Cyprinodon variegatus;* $LC50_{96\text{-}h}$). Prior tests of glyphosate on amphibians have been rare. In four species of Australian tadpoles *(Crinia insignifera, Heleioporus eyrei, Limnodynastes dorsalis,* and *Litoria moorei),* Mann and Bidwell (1999) found that $LC50_{48\text{-}h}$ values in the laboratory ranged from 3.9 to 15.5 mg AI/ L for Roundup (glyphosate plus POEA surfactant), 108 to 161 mg AI/L for technical grade glyphosate acid, and >450 mg AI/L for glyphosate isopropylamine salt (the latter two formulations lack the POEA surfactant). Perkins et al. (2000) conducted laboratory experiments on *Xenopus laevis* tadpoles and found $LC50_{96\text{-}h}$ values of 12.4 mg AI/L for Roundup, 6.8 mg/L for the POEA surfactant alone, and 9729 mg AI/L for Rodeo (an aquatic form of glyphosate that lacks the POEA surfactant). Smith (2001) examined the impact of Kleeraway (another form of glyphosate that includes the POEA surfactant) and found that nearly half of western chorus frog tadpoles *(Pseudacris triseriata)* died at 0.75 mg AI/L; plains leopard frog larvae *(Rana blairi)* experienced 0% and 100% survival at 0.75 mg AI/L in two separate experiments. All tadpoles of both species died at higher concentrations (7.5, 750, and 7500 mg AI/L). These studies suggest that the high mortality associated with commercial forms of Roundup is actually due to the POEA surfactant and not to glyphosate itself.

The high mortality rates of tadpoles associated with Roundup are in agreement with those of several other experiments that I have recently completed on tadpole species from the midwestern United States. Using static exposure experiments in the laboratory, I reared six different species of tadpoles under a range of Roundup concentrations to estimate the LC50 values. The estimated $LC50_{16\text{-}d}$ values for these North American species were lower than previously observed for most amphibian species (Mann and Bidwell 1999, Perkins et al. 2000), ranging from 0.5 to 2.5 mg AI/L (Relyea, *in press).* This suggests

that a direct overspray at the manufacturer's recommended rate (a realized pond concentration of 3.8 mg/L) should be highly lethal to these amphibians. The current study is consistent with this prediction.

I have also conducted a second outdoor mesocosm experiment in the absence of predators (to eliminate this source of mortality) and with the addition of either no soil, sand, or loam (because soil is known to absorb the two components of Roundup (glyphosate and the POEA surfactant) and remove them from the water column; Giesy et al. 2000). I exposed communities of three tadpoles species to 3.8 mg AI/L of glyphosate (in the form of Roundup, similar to the current experiment) and found that it reduced tree frog tadpole survival from 75% to 2%, toad tadpole survival from 97% to 0%, and leopard frog tadpole survival from 98% to 4% (R. A. Relyea, *unpublished manuscript).* Moreover, the addition of soil did not diminish the toxic effect. Collectively, the available data indicate that, contrary to conventional wisdom, current application rates of Roundup can be highly lethal to many species of amphibians. This result is of particular interest in light of the global decline of amphibians (Wake 1998, Alford and Richards 1999, Houlihan et al. 2001, Blaustein and Kiesecker 2002) which, in some cases, is correlated with a proximity to agricultural areas that use pesticides (Bishop et al. 1999, Davidson et al. 2001, 2002, Sparling et al. 2001).

Although Roundup is an herbicide, two lines of evidence suggest that the widespread tadpole mortality was directly due to toxicity and not to the destruction of the tadpoles' algal food source. First, much of the mortality occurred within the first st 24 hours *(personal observations).* This mortality rate was much faster than would be expected to occur with a lack of food (Audo et al. 1995) and was consistent with our single-species laboratory experiments that did not use algal food sources (Relyea, *in press).* Second, the biomass of periphyton did not decrease with Roundup. Roundup actually caused a 40% increase in periphyton by removing a large fraction of the herbivores and allowing periphyton to attain a higher standing crop. Thus, there was a positive, indirect effect of Roundup on periphyton. This indicates that Roundup directly kills amphibians rather than indirectly causing amphibians to starve to death.

Conclusions

This study highlights the importance of examining the impact of pesticides within the natural ecological context in which the taxa live. Single-species toxicity studies are invaluable to assess the relative lethality of different chemicals on both target and nontarget species. However, when toxicity studies are embedded in the nexus of interactions that compose natural food webs, we can arrive at very different interpretations due to the prevalence of both direct and indirect effects. At realistic concentrations, the two insecticides had substantial negative effects on the predatory insects and cladocerans, but they had substantial indirect positive effects on the copepods and tadpoles. The two herbicides had quite contrasting effects; 2,4-D had no impact on the community, whereas Roundup caused a major reduction in amphibian diversity, an indirect, positive impact on the periphyton that the tadpoles consume, and an indirect, negative effect on the biomass of insect predators. It is important to note that these impacts occurred over relatively short time scales (two weeks). Over longer time scales (months to years, depending on the species), many of the taxa have the potential to recover their population sizes, provided that the pesticide exposure is not a recurring event.

Although there is currently a strong empirical and theoretical push to understand the factors that determine species diversity and abundance in relatively pristine systems (Tilman et al. 2001, Chase and Leibold 2002, Downing and Leibold 2002, Naeem 2002), few habitats are untouched by anthropogenic effects, including the direct application or drift of pesticides (Lambert 1997, LeNoir et al. 1999, Leonard et al. 1999, Favari et al. 2002). We need to understand how these effects impact natural systems and whether they contribute to the global decline in biodiversity.

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Killing evergreen broadleaf trees in Southwest Oregon
Private land foresters are conducting large scale poisoning of broadleaf evergreen and deciduous trees in southwestern Oregon (madrone, tan oak, chinkapin, black oak, white oak). We abhor this practice which turns diverse forests into a monotypic stand of commercial conifers. The BLM must disclose if they intend to mimic this practice on public lands (i.e. the killing of individual trees with herbicide hatchets). If so, an alternatives must describe this practice and the impacts on public lands need to be addressed from this heinous practice. Currently we could not find reference to this technique in the FEIS document. Please include a disclaimer in the FEIS that this practice is not being considered. This is deforestation plain and simple.

Conclusion:

RNC-0207

Siskiyou Project is very skeptical of the use of herbicide treatment. Herbicides should only be considered for use as a last resort when all other means have failed. Aerial application of herbicides should be prohibited. Riparian reserves should receive a minimum of 150 feet no chemical zone. Fire remains the best way to restore our landscape, which is born of fire. Herbicide use should be kept to a minimum and the number of acres treated annually should by no means be tripled. If anything the number of acres treated annually with herbicides should be reduced from their current acreage of 305,000. We support the Restore Native Ecosystems Alternative (DEIS, Volume 2, Appendix G). Preventative measures should be taken to treat the cause and not the symptom of noxious weed invasion.

We assert that any project type NEPA analysis would find that the cumulative effects of the use of herbicides (private plus public) in intermingled private/public forest lands would either be unacceptable or require the need for additional local impact statements due to uncertainty about the transboundary effects of herbicide application on private lands affecting public lands and public land applications affecting private lands (already heavily dosed).

Please provide us a copy of the FEIS, response to comments, and decision.

Sincerely, Lisa D. Rohde

Lisa Rhode
Conservation Coordinator
Siskiyou Project

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