



United States
Department of
Agriculture

August 7, 2007

Animal and
Plant Health
Inspection
Service

4700 River Road
Unit 137
Riverdale, MD
20737

Subject: Response to comments received regarding the "Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area" Environmental Assessment

To Whom It May Concern:

We solicited comments from the public regarding an Environmental Assessment entitled "Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area" dated May 2007. The comment period closed on June 23, 2007, and four people submitted comments on the document. Their comments and APHIS' response to the comments are attached. As the signatory of the Finding of No Significant Impact (FONSI) associated with the Environmental Assessment, I have read the comments as well as APHIS' response. I believe that the response addresses all significant issues raised. I have determined that there is no need to revise the Environmental Assessment and therefore reaffirm the FONSI signed on May 22, 2007.

Sincerely,

Christine Markham
National ALB Program Director



Safeguarding American Agriculture
APHIS is an agency of USDA's Marketing and Regulatory Programs

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**Response to Comments Received Regarding the May 2007 Environmental Assessment,
“Asian Longhorned Beetle Cooperative Eradication Program
in the New York Metropolitan Area”**

Issue: Potential impact of program activities on wading bird populations.

One commenter indicated that Asian Longhorned Beetle (ALB) host tree removal could impact wading bird populations. USDA-APHIS is aware of the sensitive nature of wetland communities as well as the bird populations that they support; however, the risk of doing nothing with regards to the ALB infestation on Staten Island has a much greater threat to wading bird populations than the preferred alternative of host removal, preventative treatment, and survey. If left uncontrolled, ALB could weaken and destroy millions of host trees in the New York Metropolitan Area.

The Environmental Assessment recognized that there is the potential to impact wading bird populations in the host tree removal area. However, the currently affected area on Staten Island is relatively small and localized effects on some birds should not have a significant effect on wading bird populations in the Metropolitan Area. The New York State Department of Environmental Conservation agreed that immediate action is needed in the infested area to prevent ALB populations from spreading and issued an Emergency Authorization for work in the wetland areas on Staten Island. As part of this authorization, APHIS was made aware of the significant wildlife areas and agreed to have on call a NYS-licensed wildlife rehabilitator or veterinarian “to assure compliance with state and federal wildlife and migratory bird regulations.” APHIS believes that this should minimize the risk to birds in the affected area while preventing the spread of ALB, which would ultimately affect many more birds.

Issue: Survey and preventative treatments should be increased.

A commenter suggested that APHIS take a proactive approach to ALB and increase survey areas as well as preventative treatments. The Environmental Assessment specifies work to be conducted within a particular radius around infested trees, which is based on the best scientific knowledge currently available. APHIS believes that this is adequate to control the ALB infestation on Staten Island. Most of the resources for the program are applied to the eradication effort described in the Environmental Assessment, however less intensive survey efforts continue for up to 25 miles from infested trees. This effort is not detailed in the EA since survey has no adverse environmental impacts. In addition APHIS is working with the public and citizen’s groups to raise awareness of ALB and to develop ways that they can work cooperatively with the eradication program. These programs will continue to expand as groups contact APHIS with their interest in the program.

An increase in preventative treatments could reduce future infestations; however, the treatment protocols balance the best science with the resources available. Preventative chemical treatments are costly in terms of funding and labor. APHIS feels that the current treatment regime is adequate to prevent the beetle from spreading from known infested areas, and the treatment radius is based on the dispersal biology of the beetle. Conducting additional preventative

chemical injections beyond this radius would result in treatments occurring in areas where the best available science indicates that the beetle is unlikely to be found, essentially wasting the resources of the program and taxpayer money. Although the beetle could still be found in these areas due to invasion from unknown infested areas, it is impossible to anticipate and target resources against unknown infestations.

Issue: Apparent lack of justification for the size and scope of the eradication program.

Two commenters questioned the justification for the program and the potential for significant effects. According to the implementing regulations for the National Environmental Policy Act, an Environmental Assessment is designed to be a “concise public document” with “brief discussions” rather than a detailed analysis of ALB and the options for controlling it. The Environmental Assessment incorporated by reference over ten years worth of experience in controlling the pest. This includes the consideration of best available national and international peer-reviewed scientific studies of ALB biology and control and of the pesticides and the techniques used to apply them. After analysis of the potential risks to the environment, forest health, and forest resources, APHIS determined that control and eradication of ALB was of national significance and could be done with minimal risk to human health and the environment. The current control program on Staten Island is the culmination of this work. APHIS continues to investigate new methods for eradicating ALB. But at the current time, an integrated approach including survey, chemical treatment, host removal, regulatory action, and public outreach is the most effective strategy to ensure eradication.

One commenter references a top APHIS scientist referring to the control program as a ‘crapshoot’, but this is taken out of context. The scientist was questioned as to whether or not the control program was certain to eradicate ALB. When dealing with the extirpation of organisms from the environment, certainty is rarely guaranteed. The current program is APHIS’ best science-based effort to eradicate the beetle while minimizing adverse environmental impacts. To the extent that no one knows, or can know, the extent of the infestation on Staten Island, there is no guarantee that ALB will not be found in other locations on Staten Island or other areas in the future. Based on the best scientific knowledge and surveys to date, it is believed that the current program provides the best opportunity at eradicating ALB.

One commenter notes concern with potential significant effects from “cutting a .5 mile swath” of trees to control ALB. The eradication program does not remove all trees within a 0.5 mile radius of an infested tree, but only trees that ALB uses as a host. APHIS estimates that this would result in the cutting of 40% of the trees in the removal area. APHIS also recognizes that there may be an impact on organisms that use those trees for food, cover, and other needs. However, if no action is taken on the current infestation on Staten Island, there is little doubt that the insect will spread, ultimately resulting in the destruction of millions of trees rather than the thousands that are in the current control area. APHIS does not take the removal of these trees lightly and is working cooperatively with New York State Department of Agriculture and Markets, New York State Department of Environmental Conservation, the New York City Department of Parks and Recreation, and other local and state government agencies to minimize the potential effects of the program. A 14-point plan is detailed in the Emergency Authorization granted by the New York State Department of Environmental Conservation to work in the area which will minimize

the potential impact to wildlife, naturally vegetated areas, wetland, water bodies, and other natural resources. While a program of this scope is bound to have some impact on the environment, every level of government is working together to ensure that they are not significant.

Issue: The public was not involved in the planning process.

Two commenters expressed concern with public involvement and outreach. The National Environmental Policy Act implementing regulations require public involvement but do not detail or provide exact specifications on how this should be done. At least three public meetings were held prior to the start of eradication activities on Staten Island in order to describe the program and to answer questions. Articles describing the ALB program were printed in the *New York Times* and *Staten Island Advance*. NY1 cable news broadcast a story on ALB and the eradication activities. Public notice of the Environmental Assessment was made in the *Staten Island Advance*. General public outreach to raise general awareness of ALB was conducted with mailers and newspaper advertisements. Homeowners with host trees in the removal area are all contacted ahead of time and their written consent is required prior to tree removal. APHIS feels that all of these avenues provide for sufficient public involvement with the program, and we welcome additional ways to cooperate with individuals and groups interested in the ALB program.

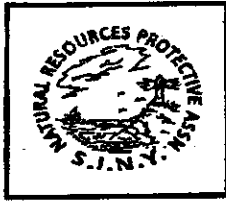
Issue: Eradication does not include reforestation of removed host trees.

Several commenters were concerned that there were no plans for reforestation of areas where host trees are removed. APHIS does not have formal plans for reforestation and funding for such activities is uncertain. As a result, reforestation was not included as an action in the Environmental Assessment. However, APHIS has worked and is working cooperatively with other federal and state agencies on reforesting host-removal areas. In the past, APHIS worked with the U.S. Forest Service to replace removed trees with non-host trees, which has resulted in the replanting of over 10,000 trees in the New York Metropolitan Area. The Forest Service also assists affected communities and neighborhoods recover from the loss of their trees with seed money (pending availability) for replacement of trees as well as direct technical assistance and information programs directed towards the selection, care, and maintenance of trees. APHIS is also working with the New York City Department of Parks and Recreation with regards to replanting in the Staten Island treatment area. While APHIS cannot guarantee that all removed trees will be replaced, efforts are underway at several levels of government for reforestation of the host-removal areas.

Issue: There is no justification for the size of the host removal area and it should be reduced.

Several commenters felt that the 0.5 mile radius for tree removal around infested trees was too large and not justified. As noted above, Environmental Assessments are designed to be concise rather than detailed documents, and often incorporate material by reference. The details on size of the host removal and preventative treatment areas are in the references of the Environmental Assessment. In short, USDA Agricultural Research Service work on ALB dispersal and flight

ability and APHIS methods development analysis of detection and dispersal data in Chicago indicate that conducting control activities within 0.5 mile radius of an infested tree will encompass greater than 99% of the area in which adult beetles are likely to disperse. This allows the program to virtually assure eradication in areas known to be infested with ALB. Using a smaller cutting radius around known infested trees decreases the likelihood of removing other trees that may be infested by dispersed adult beetles. Unfortunately, it is very difficult to simply survey trees for infestation and remove only infested trees. Trees may be infested with ALB larvae and show little to no outward signs of this infestation. Even trained survey specialists are about 60% effective at visually inspecting a tree for infestation and there are no other non-destructive tools available to determine if a tree is infested with ALB. Based on tree species composition and host density within the current infested area of Staten Island, host-tree removal in a 0.5 radius around known infested trees and chemical treatments of host trees between the 0.5 mile to the 1.0 mile radius appears to be the most effective option available for successful eradication of ALB.



Natural Resources Protective Association

of Staten Island Inc.

P.O. Box 050328 Staten Island, NY 10305 (718) 987-6037

Established 1977

June 5, 2007

Executive Director
Kerry Sullivan
North Shore Waterfront
Conservancy

Chair
Ida Sanoft
Coalition Against Water
Disposal

Treasurer
John Malizia
Fisherman's Conservation
Association

Trustees
Tony Rose
Staten Island Drivers

Jim Scarcella
Friends of Clearwater

Martin Schreiberman Ph.D.
AREAC

Tony Somma
NRPA

Charles Talley Ph.D.
NRPA

John Tancredi Ph.D.
AREAC

Andy Willner
NY/NJ Baykeeper

Cindy Zipf
Clean Ocean Action

Christine Markham NPD, USDA APHIS, PPQ
ALB Eradication Program
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

Dear Ms. Markham

We are writing to address the "Finding of No Significant Impact" (FONSI) ALB Cooperative Eradication Program Metro Area Environmental Assessment May 2007, (EA) with a Publication Date on Staten Island of 5/23/07 and 5/24/07. Please note the published link to the documents is incorrect, and you have made no effort to amend the public notice. We understand there may be a meeting at Community Board 2 on 6/6/07, and it is not clear if APHIS will attend

While we understand the ALB is a significant harmful pest, we disagree with your assessment that the removal of 2,900 trees on Pralls Island in April 2007 and the ongoing removal of 7,900 trees at GATX / Maritime Forest is wholly necessary to control and eradicate the ALB.

Your preferred alternative seems to be singularly selected by you. While you do reference some consults, its clear that far more scientific input is needed, and that the wholesale destruction of thousands of trees may not be required.

The EA itself is faulty, there is *indeed* a significant impact when wholesale eradication is used: Cutting a .5 mile swath distorts the habitat of several hundred wading birds of the Harbor Herons program, including black crowned night herons, glossy ibis, great white herons, yellow crowned herons, little blue and great blue herons, black capped chickadees, and many more bird species. In addition, reptiles in the area like the black racer snake and Fowler's toad will get crushed by unwarranted mounds of destroyed trees falling on them. The mammals such as deer, red fox, and muskrat, are thrown into shock when mass destruction takes place. When trees are removed, the soil becomes unstable and unwarranted erosion and excessive sedimentation of wetlands and waterways does occur, impairing water quality.

This is your 1st foray into a natural area, and APHIS has failed in that there was little or no public outreach. The meeting at the Greenbelt Nature center was informative, and there was a presentation for Community Board 1 on 5/24/07, but aside from that you have failed to spell out the full scope and damages caused by your actions. Your top scientist referred to this as a 'crapshoot', this does not inspire any confidence in your actions.

Clean Air Campaign, S.I. Federation of Sportsmen's Clubs, Midland Beach Civic Association, Midland Beach Sportsmen's Club, Crescent Beach Civic Assoc., Citizens of Ocean Breeze, Richmondtown/Clarke Ave. Civic Assoc., Protectors of Pine Oak Woods, Baykeeper of New York/New Jersey, Conference House Park/Barton Bay Conservancy, Mariners March Conservancy, New Dorp Beach Civic Assoc., Princes Bay Sportsmen's Assoc., Linden Creek Rowing Assoc., Staten Island Boatmen Assoc., S.I. Citizens for Clean Air, F.A.T.E., Global Action, Timmerly High School, Friends of the Heron Pond, Friends of North Shore Greenbelt, Friends of Gateway H.O.S.C., Mariners Harbor Civic Assoc., Arlington Civic Assoc., Clean Ocean Action, Friends of Spanish Camp, N.Y. Harbor Lights, Lighthouse Research for Preservation, Great Kills Harbor Preservation Committee, Coalition for Safe Boating Marine Environment, S.I. Friends of Clearwater, S.I. Environmental Coalition, S.I. Taxpayers Assoc., Save The Bay, Beachcomber Surf Club, S.I. Explorers Club, S.I. Sport Divers, American Littoral Society, S.I. Tuna Club, Richmond County Yacht Club, Great Kills Yacht Club, S.I. Yacht Club, Staten Island Register, The Waterfront Watch, International Order of the Blue Gavel, Coastal Conservation Association Staten Island Chapter

Visit us on the Internet at WWW.NRPA.COM

At Pralls, to our knowledge, there was no meeting with the public, you consulted with Parks NRG and NYSDEC, and NYS Agriculture/Markets, but not with the public stakeholders, a violation of the stated Environmental Assessment policy that public outreach is occurring. Be advised we have little confidence that the agencies mentioned above are willing to state to you what the full effects of your actions are, but a FONSI is just incorrect. You need to do more surveillance, instead of chopping down 7,900 trees for 3 infected trees.

We certainly approve of more injections of imidacloprid, please expand its use. You have defined the .5 mile radius on your own; it doesn't seem to be based on sound science, and if the beetle flies 500 yards after leaving a host tree (after 6 years) it doesn't mean it will travel several miles.

We request an immediate cessation of all cutting activities, and expansion of the chemical treatment. We request that you prepare a full EIS as required under NEPA, because clearly the long term impact of ALB needs a full scoping process. In our opinion, although time may be tight, the way APHIS is conducting itself is not in the best interests of our region,

We have significant problems with asthma and many other air borne particulates in our region, and wholesale destruction of trees is an adverse action that will hasten poor air quality, hurting our youth. There are no funds for reforestation at GATX; which is a violation of the stated EA. This is not acceptable. Please advise on reducing the cutting radius and immediate implementation of the EIS process. Thank you.

James Scarcella NRPA

CC: USDA APHIS
Plant Protection and Quarantine Surveillance and
Emer Programs Planning and Coordination
Ms. Wheat
4700 River Road, Unit 137
Riverdale MD, 20737-1229

All elected officials

NY NJ Baykeeper, A. Willner, B. McDonald

NYS DEC—J. Gilmore, S. Mattei

NYC DPR—W.Tai, A.Benape, T.Paulo

NSWCI, Protectors of Pine Oak Woods, Wild Metro, NYC Audubon, Sierra Club Media



June 11, 2007

The North Shore Waterfront Conservancy of Staten Island, Inc.
P.O. Box 140502
Staten Island, New York 10314

COPY

Ms. Christine Markam, NPD, USDA APHIS, PPQ
ALB Eradication Program
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

Dear Ms. Markam:

Enclosed you will find a copy of a letter written to Congressman Vito Fossella regarding Staten Island and the Asian Long Horn Beetle. Our organization is not in agreement with the way this insect was monitored, the lack of real public notification and comment period. As well as the loss of almost 11,000 native trees without there being a complete reforestation and restoration plan in place.

This is not a disaster made by nature but a man made disaster based on carelessness this makes it all the more unconscionable and sad. The laxness to which this was handle as if everything that was done was as an after thought is amazing and robs the residents of Staten Island of their right to Democracy, have we become a Totalitarian State?

Your agency must improve its monitoring system of predatory insects, animals, etc., adhere to a proper public notification period where residents are informed clearly and comprehensively, and residents must be allowed a proper comment period. And lastly your agency must come up with a better way of eradicating the ALB and similar types of insects, wildlife, fish, etc., that are harmful to our environment and to which our country has no known natural enemy to eliminate them.

Bottom line we are too smart of a people to behave in such a haphazard, mediocre fashion.

Thank you for your time and we look forward to hearing from you.

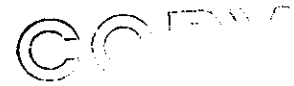
Sincerely,

Beryl A. Thurman, President
NSWC

CC: USDA APHIS, Plant Protection and Quarantine Surveillance and Emergency Programs Planning and Coordination, Ms. Wheat, NRPA, NY/NJ Baykeepers, MMC, SWC, PPOW, NSWC, SITA.



The North Shore Waterfront Conservancy of Staten Island, Inc.
P.O. Box 140502
Staten Island, New York 10314



June 11, 2007

Congressman Vito Fossella
13th District, New York
1239 Longworth House Office Building
Washington, DC 20515-3213

Dear Congressman Fossella:

On behalf of the members of the North Shore Waterfront Conservancy of Staten Island, Inc., we would like to express our concern regarding the monitoring, public notification and comment period surrounding the Asian Long Horn Beetle.

Being told by the USDA's Animal and Plant Health Inspection Service that the reason that Prall's Island and Staten Island were not being properly monitored for this insect and the reason the people of Staten Island were not given proper notification and comment period was due to a lack of funding is simply unacceptable.

In the article written by Andy Newman in the Sunday, June 10, 2007, New York Times he says "Considering the scope of the arborcide, there has been relatively little public outcry. If you are going to cut down 11,000 trees in New York City, northwestern Staten Island is apparently the place to do it."

We cannot fault this reporter or anyone else for viewing us as a population disinterested, lazy and ignorant of our environment based on first appearances. The truth is we are very upset over how this whole thing was handled and feel that we were not allowed to participate, as is our right under democracy.

After 9 plus years of this beetle being in our country no one thought of a better eradication plan other than cutting and burning 11,000 native trees? Followed by never developing a fully funded reforestation and restoration plan? It is apparent that our Federal Government cannot be looked to, to protect our Staten Island neighborhoods, forest and parks, isn't it time we got a clue and did it for ourselves.

This act of injustice makes it necessary to fund programs to train and educate Staten Islanders on forestry, monitoring, maintenance and upkeep of one of Staten Island's greatest assets our native trees and plant life. It is only by chance that Prall's Island does have reforestation funding; Staten Island has no such funding. We are asking that you make the necessary efforts to assist in providing the funding for proper public notification, and

comment period, reforesting and restoration due to loss, so that if this should ever occur again we will be financially prepared to help ourselves. We have sent similar letters to our state representatives and city elected officials.

Once again on behalf of the members of the NSWC we would like to thank you for your time, support and consideration, and we look forward to hearing from you.

Sincerely,

Beryl A. Thurman, President

www.nswcsi.org

CC: Andy Newman, NY Times, NSWC, Borough President James Molinaro, Commissioner Adrian Benepe, Commissioner Thomas Paulo, NRPA, MMC, SMC, Christine Markham, NPD, USDA, APHIS, PPQ, SITA, Councilman James Oddo, Councilman Michael McMahon, Councilman Vincent Ignizio, PPOW.

USDA-APHIS
4700 River Road
Unit 137
Riverdale, MD
20737

**Re: Comment, EA: ALB Cooperative Eradication Program in the NY Metropolitan Area,
May 2007**

20 June 2007

To Whom It May Concern:

I submit the following comment in regards to the May 2007 Environmental Assessment and Finding of No Significant Impact drafted for the Asian Longhorned Beetle (ALB) Cooperative Eradication Program in the New York Metropolitan Area, as accessed from the USDA website on 17 June 2007 (http://www.aphis.usda.gov/plant_health/ea/downloads/alb-fonsi.pdf).

In regards to the statement that "the cutting (removal) of susceptible host plants within a defined radius of an ALB find may have adverse effects on local wildlife that depend on vegetation for food, cover, and related needs" (pg. 5, III. Environmental impacts, B. Preferred Alternative), I request that you consider the adverse effects that removal of infested and/or susceptible host trees would have on long-legged wading bird populations in metropolitan New York.

Currently, seven species of colonial wading birds (i.e., herons, egrets, and ibis) nest on islands in the NY/NJ Harbor and surrounding estuaries (Bernick 2007). These species include Black-crowned Night-Heron, Great Egret, Snowy Egret, Glossy Ibis, Little Blue Heron, Tricolored Heron, and Cattle Egret. Two additional species, Green Heron and Yellow-crowned Night-Heron, nest both within island colonies and in mainland areas. To date, there are approximately 1,800-2,000 pairs of wading birds currently nesting in the metropolitan New York area.

In the mid to late 1970's, wading bird populations in NY/NJ Harbor began to increase dramatically. These birds, so closely tied to estuarine foraging resources, are considered to be important bioindicators for ecosystem health. Several influential publications on the health of NY/NJ Harbor by the Hudson River Foundation, the Hudson Estuary Program, Trust for Public Land, and others use the resurgence of wading birds into NY/NJ Harbor as evidence for improving water quality conditions and subsequent increases in estuarine fish and invertebrate populations (Steinberg et al. 2004). In 1990, the US Environmental Protection Agency designated a considerable amount of the western shore of Staten Island, including areas impacted by the recent ALB infestations and management on Prall's Island and Old Place, as 'The Harbor Herons Wildlife Refuge.'

These wading birds are listed as species of special concern by the New York State Department of Environmental Conservation. Additionally, the New Jersey Department of Environmental Protection designates two of these species (Black-crowned Night-Heron and Yellow-crowned

Night-Heron) as state threatened, and another two (Tricolored Heron and Little Blue Heron) as species of special concern. Several of these species have worldwide ranges, and are listed in the North American Waterbird Conservation Plan (Kushlan et al. 2002) as species of moderate concern, suggestive of a moderate decline in worldwide populations.

In 2007, eight islands were confirmed as colonies for wading birds in the NY/NJ Harbor area, including (north to south) Huckleberry Island, Goose Island, North Brother Island, South Brother Island, Mill Rock, Canarsie Pol, Subway Island, Hoffman Island, and Swinburne Island. Mainland nesting for Yellow-crowned Night-Herons were noted in northwestern Staten Island (in the vicinity of Old Place Marsh), the Rockaways, and at several locations in Secaucus, NJ (Bernick 2007).

Wading birds require trees for nest-building and nest material. In the NY/NJ Harbor colonies, some of the preferred nesting tree species directly overlaps with the preferred host trees for ALBs. – for instance, approximately 80% of the wading birds on South Brother Island nest in Box Elder *Acer negundo*. Historically, Gray Birch *Betula populifolia* has been an important nesting tree for Staten Island area colonies, including Prall's Island, Isle of Meadows, and Hoffman Island.

If infested trees are located on island or in mainland habitats where wading birds nest, or wading bird colonies fall within the removal area as designated in the current ALB management plan, there is no doubt that the removal of infested and/or susceptible host trees used as nesting trees by wading birds will have a disastrous impact on breeding populations in the metropolitan NY/NJ area.

The timing of tree removal may also have a disastrous impact on wading bird population stability. For instance, if an ALB infestation is located in a wading bird colony where the majority of tree species are not ALB hosts (i.e., Black Cherry *Prunus serotina*), removal of infested trees should occur outside of the breeding season to avoid impact on nesting. In the NY/NJ Harbor area, nesting begins in early March and concludes in early to mid September. If a small number of host trees require removal due to ALB infestation at an active wading bird colony, if the removal occurs during the breeding season then it is almost certain that nesting will be detrimentally impacted.

I bring the issue of wading bird activity in NY/NJ Harbor to your attention as a call for early action in areas where known wading bird colonies exist, and do not yet fall into removal, treatment, or survey areas. At present, we do not know if ALBs are on island colonies that fall just outside of current survey efforts (Shooters Island, South Brother Island), to those that may become impacted by ALBs in the future (Huckleberry Island, Goose Island, North Brother Island, Mill Rock, Canarsie Pol, Subway Island, Hoffman Island, and Swinburne Island).

I suggest that the ALB Cooperative Eradication Program take a proactive approach with these sensitive areas, by (1) surveying all areas known to support breeding wading birds for the presence of ALB, and (2) creating a preventative treatment plan, such as imidacloprid injection, for these locations to reduce the opportunity future infestations will occur. I also recommend that the ALB Cooperative Eradication Program work closely with the Hudson Estuary Program's

Harbor Herons Subcommittee (lead by Dr. Susan Elbin and Yigal Gelb) to discuss management options and nesting schedules.

Thank you for your consideration of the above comments. I realize that my comments are quite specific, but I feel strongly that wading bird populations and the critical nesting habitat they require could be protected with adequate foresight and early action to prevent ALB infestations. If you have any further questions regarding my statements, I would be pleased to discuss them with you – I can be reached via the contact information below.

Sincerely,

Andrew J. Bernick, Ph.D.

Alexandria, VA 22303

Tel:

Cc: Dr. Robert Baca via e-mail, 22 June 2007

Literature Cited

Bernick, A. 2007. NYC Audubon Harbor Herons Project: Nesting Survey Report 2007. Unpublished report to NYC Audubon. *In prep.*

Kushlan, J. A., M. J. Steinkamp, K. C. Parsons, J. Capp, M. Acosta Cruz, M. Coulter, I. Davidson, L. Dickson, N. Edelson, R. Elliot, R. M. Erwin, S. Hatch, S. Kress, R. Milko, S. Miller, K. Mills, R. Paul, R. Phillips, J. E. Saliva, B. Sydeman, J. Trapp, J. Wheeler, & K. Wohl. 2002. Waterbird conservation for the Americas: the North American waterbird conservation plan, version 1. Waterbird Conservation for the Americas, Washington, D.C. 78 pp.

Steinberg, N., D.J. Suszkowski, L. Clark, and J. Way. 2004. Health of the harbor: The first comprehensive look at the state of the NY/NJ harbor estuary. A report to the NY/NJ Harbor Estuary Program. Hudson River Foundation, New York, NY. 82 pp.

June 21, 2007

Ms. Sharon Wheat
US Department of Agriculture
Animal and Plant Health Inspection Service
4700 River Road, Unit 137
Riverdale, MO 20737

Dear Ms. Wheat,

Thank you for the opportunity to comment on the Environmental Assessment for the May 2007 effort to eradicate Asian Longhorned Beetle here on the west shore of Staten Island.

I am dismayed that after nine years the response is the cutting of almost 8,000 trees in a natural area. To me, the occurrence of Asian Longhorned Beetle is no longer an emergency, but something that needs to be aggressively monitored and eradicated without destroying habitat. I hope Animal and Plant Health Inspection Services (APHIS) is working to develop less destructive practices, to be more aggressive in surveying potential areas and also to be on the look out for the next aggressive invader and destroyer of the natural environment. I appreciate that this is a big task and that it is limited by the amount of money allocated for this purpose. I have written to my legislative representatives to ask for funds for APHIS so that surveys of critical areas can be done on a timely basis.

Sincerely,

Catherine Barron

Staten Island, New York 10310

E-mail:

Mailing address above.

Home address is

Staten Island, NY 10310.