



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

August 14, 2015

Carol Brown
Invasive Weeds Project
2647 Kimberly Road East
Twin Falls, Idaho 83301

Dear Ms. Brown:

The U.S. Environmental Protection Agency has reviewed the Boise National Forest and Sawtooth National Forest June 25, 2015 Notice of Intent to prepare a Forest-Wide Invasive Plant Treatment Environmental Impact Statement (EPA Region 10 project number: 15-0044-AFS).

Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

Project summary

The Draft EIS will analyze and disclose the effects of using an Integrated Weed Management approach to control invasive and noxious weeds forest-wide. The alternatives address whether or not to treat invasive plants on the forests, and if so, what methods, how much treatment and what strategies (including adaptive management and Early Detection Rapid Response) will be used to contain, control or eradicate invasive plants.

Alternatives include: the Proposed Action, which would maximize the control of invasive and noxious weed species using an Integrated Weed Management approach; and, 'The Current Management Alternative,' which would continue current programs, treatments and levels of effort for weed management. Under the Proposed Action, a maximum of 20,000 acres for each forest is proposed for treatment annually: 2,000 acres biocontrol, 2,000 acres manual/mechanical treatment, and 16,000 acres chemical treatment.

We support the overall purpose of reducing the negative effects of invasive plants

We agree that invasive plants create many adverse environmental effects, including displacement of native plants; reduction in functionality of habitat and forage for wildlife and livestock; threats to populations of threatened, endangered and sensitive species; alteration of physical and biological properties of soil, including productivity; changes to the intensity and frequency of fires; and loss of recreational opportunities.

We support the effort to reduce these adverse environmental effects through the establishment of a comprehensive Integrated Weed Management approach that would allow for the implementation of timely and effective invasive plant management and prevention for projects and programs on the forests.

Minimizing impacts to people and the environment

We believe that environmentally preferable weed management will come from the alternative which best meets the overall purpose of the proposed action while minimizing impacts to people and the environment. Many elements of the Initial Proposed Action will help minimize impacts to people and the environment, including:

- Early Detection/Rapid Response - by reducing the overall need for treatment;
- monitoring - including consideration of impacts to non-target resources; and,
- design criteria - for example,
 - using only approved biological control agents,
 - minimizing soil disturbance,
 - performing herbicide applications with direct supervision of licensed Idaho professional herbicide applicators,
 - not applying herbicides in wind conditions exceeding 5 miles per hour,
 - using indicator dye,
 - providing a minimum buffer of 300 feet for aerial herbicide application around developed campgrounds and private land (unless otherwise authorized by adjacent private landowners).

We look forward to the Draft EIS's comprehensive list of elements aimed at minimizing impacts to people and the environment.

Compare the alternatives' impacts by focusing on elements which are unique to the action alternatives

To help contrast the potential environmental impacts of the alternatives, we recommend that the Draft EIS focus on and clearly differentiate the new and unique elements of the action alternative(s). We believe that several of the treatment methods and design criteria in the "Initial Proposed Action" may also be part of current management. Focusing on the new and unique elements of the action alternatives will help to highlight the proposal's estimated additional reductions of invasive plant related adverse impacts and additional protections for people and the environment.

Prevention

Preventing the establishment and spread of invasive plants is, as the Initial Proposed Action Scoping Letter Attachment 1 states, "...the first line of defense and is a crucial element of Integrated Weed Management." Prevention helps to avoid, for example, potential risk from chemical treatments.

The Initial Proposed Action cites "External and internal education and outreach," but we are unclear how the proposed action's education and outreach or other preventative measures would be different from current management. Also, we are concerned that existing preventative measures do not appear to be adequate. According to the June 29, 2015 'Letter from Forest Supervisor Introducing the Invasive Plant Species Project,' "Weed management on both forests is currently being accomplished under a number of existing weed treatment documents and decisions.... While some of the initial plant infestations identified in the previously completed documents and decisions have been successfully contained or controlled, many new infestations have appeared..."

To address the ongoing prevention challenge, we recommend that the Draft EIS rigorously explore management actions aimed at preventing the establishment and spread of invasive plants. Consider requiring preventative measures for known vectors - such as tire wash stations for Off-Highway Vehicle staging areas.

Thank you for this opportunity to provide comments. If you have any questions, please contact me at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink, which appears to read "Erik Peterson".

Erik Peterson

Environmental Review and Sediment Management Unit

