



Toiyabe Chapter of the Sierra Club
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April 2, 2018

William Dunkelberger, Supervisor
Humboldt-Toiyabe National Forest
1400 Franklin Way
Sparks, NV 89431

ATTN: Jim Winfrey

Re: scoping comments on proposed EIS on Integrated Invasive Plant Treatment Project

Dear Spvr. Dunkelberger,

On behalf of the 6,500 members of the Toiyabe Chapter of the Sierra Club in Nevada and the Eastern Sierra, I am pleased to submit scoping comments on an Environmental Impact Statement (EIS) for a proposed action by the Humboldt-Toiyabe National Forest (H-TNF) on an Integrated Invasive Plant Treatment Project. We strongly support the stated goal of "promoting healthy and thriving native plant communities across the Forest."

It is not clear to us, however, why the H-TNF's proposal does not include "prevention" of the spread of these invasive species, instead of its single focus on after-the-fact treatments, essentially of the "symptoms" of the problem, not the problem itself. The scoping document identifies how invasive plants are being spread - "...transportation systems, livestock grazing and off-road suppression activities...wild animals, wind, water...wildland fires...", yet the treatments which are discussed in the proposed action do not address how the H-TNF is addressing these specific "causes" to prevent the spread of invasive plants. Nor is this list of causes of weed invasion exhaustive, especially the proposed use of fuel or fire breaks or "green-strips" plowed into intact sagebrush communities in order to reduce fuels or "improve" fire fighting capacities.

We know that the USFS does try to address at least some of these threats - "weed-free hay" for recreational horse use, cleaning of vehicles and gear which has been in weedy areas, etc. What other programs or methods or actions are currently used by the H-TNF to combat weed expansions?

The EIS should directly address the ways invasive species are being spread and what the H-TNF is doing in its existing invasive plant management and control programs to prevent their spread. In addition, are the current management and control programs effective? How can they be improved? We are concerned that if better ways to prevent the spread of invasive species are not developed, then the best "treatments" will not work very well.

Scoping issues:

1. Future NEPA: Will specific weed treatments require additional evaluation under the National Environmental Policy Act, either Environmental Assessments or EISs? Or is this EIS supposed to be

more of a "programmatic" EIS, with no future public input opportunities? The scoping documents repeat the words, "timely" and "flexibility", but do not clearly explain what is meant by these terms. Please clarify in the EIS.

2. Baseline conditions: What are the baseline conditions of the areas to be treated? And, how old is this data? Will the H-TNF fill in the data gaps before implementing projects? We're hoping that the draft EIS will provide information on past burns on the H-TNF and which ones have recovered or are in the process of recovery and which still need fire rehabilitation. What is the status of the current H-TNF weeds program and how will it be changed by the proposals in the dEIS?

3. FIAT: Have the proposed treatment areas on the H-TNF gone through the Fire and Invasives Assessment Tool process? Will the FIAT information be provided in the EIS, since FIAT has not, to our knowledge, ever been published or open to public comments?

4. Greater Sage Grouse Forest Plan Amendments: What are current directions under the Greater Sage Grouse (GRSG) Conservation Plan and Forest Plan Amendments on invasive plant treatments relating to GRSG populations and habitats on national forest lands in Nevada? How will the proposed EIS comply with these Plan Amendments?

5. Goals and objectives: What kinds of goals and objectives will projects under this EIS have, so that the H-TNF can determine whether the projects have been effective or not? Are the goals certain levels of restoration? rehabilitation? soil stabilization? watershed improvements?

6. Monitoring: What kinds and levels of monitoring will the H-TNF require of these proposed projects?

7. Adaptive Management: We are concerned that proposed treatments, especially herbicides in landscape-scale restoration projects, will not work and will also have unacceptable negative impacts on the environment, wildlife habitat, water quality, biodiversity and human health. How will the "results" from monitoring be used to change H-TNF weed management, policies, and actions to address and correct the use of ineffective and harmful treatment tools?

8. Setting priorities for projects: The treatment areas cover thousands of acres all over Nevada. What are the current priorities for weed treatment? How will the H-TNF determine "new" priorities for which projects to fund and implement each year under this EIS? What is the process and what criteria are considered in setting project priorities? Are there opportunities for public input into these decisions? Will the H-TNF use the FIAT process to identify priorities for projects?

9. Ground rules for use of herbicides: What are the USFS ground rules for using each of the herbicides listed in the scoping information, including when, where, what, why, and how they can be used on specific weeds or on specific sites? And the same questions about non-usage? or use restrictions?

10. Design features: What are the design features the H-TNF will use to reduce or eliminate potential adverse impacts of each treatment and restoration method and the tools, technologies, and products to be used, especially the aerial-based use of herbicides?

11. Fuels reduction: How will this EIS address the role of invasive species in fueling wildfires, especially extreme events, as well as the role of proposed projects for the management or control of

weeds under this EIS in fuels reduction and management?

12. Integration: This term is part of the proposed EIS, yet is not defined. What is the H-TNF trying to integrate? Various tools or methods to control and manage invasive weeds? Or does it include combining necessary changes in management of Forest uses to help prevent their role in directly spreading invasive plants? Or integrating the current H-TNF weed programs with the new programs under the EIS?

13. Prevention: Please explain the H-TNF is current weed prevention programs, policies and actions and how they will be changed under the draft EIS proposals?

14. Invasive plants: What are the 58 known species of invasive plants on the H-TNF? Do they include pinyon pines (*Pinus monophylla*) or Utah juniper (*Juniperus osteosperma*)?

15. 28,500 acres of weeds on the H-TNF: We understand from the scoping materials that this acreage represents the areas on the Forest which have been surveyed for weeds. Does the H-TNF have an estimate of how many total acres are infested with weeds?

16. Maps: Thank you for including links to the Ranger District maps of invasive weeds on the EIS website. They were very useful in visualizing the distribution of weeds, although the distribution may be a function of where weeds are surveyed - along roads and creeks - rather than off-road weedy sites. The maps should be updated as future weed surveys provide data which will increase the accuracy of mapping the extent of weed infestation.

Thank you for considering our comments and questions.

Sincerely,



Rose Strickland, Chair Public Lands Committee
Toiyabe Chapter of the Sierra Club

