

Jim Prunty
Natural Resources Specialist

August 10, 2015

Attention: Invasive Weeds Project

Sawtooth National Forest
Supervisor's Office
2647 Kimberly Road East
Twin Falls, ID 83301

RE: Public Comments, Invasive Weeds Project

Invasive weeds, both those designated as "Noxious" as well as exotic annuals (e.g. cheat grass) and other weedy species of all types are of increasing environmental and public concern.

This is particularly true in light of annually increasing ground disturbing activities on forest lands (e.g. livestock use, off-highway vehicle use) as well as stressful environmental conditions (e.g. drought) that favor the establishment and maintenance of weedy species that are more adapted to heavy disturbance regimes than are a majority of our native plants.

Invasive weeds have increased across Sawtooth National Forest lands in recent decades, and continue to expand within recreation sites (e.g. campgrounds and summer homes) as well as across rangelands at all elevations and in all habitat types. This can be readily observed on the SNRA and Northern Divisions, as well as across the Southern Divisions.

As a very simple example, field bindweed quickly established itself along the edges of the newly graveled roads following forest improvements (e.g. roads and campsites associated with Porcupine Springs) on the Cassia Division. Just this June, while attending the Rock Creek Fuels & Vegetation tour, we observed that field bindweed is now also well established within the adjacent forested summer home areas- including along individual cabin trails and parking sites.

Once established, species like field bindweed and other weeds (e.g. leafy spurge, whitetop) are spread not only by livestock and vehicles, but through seed dispersal following consumption of their seeds by big game, upland game birds, and other wildlife (e.g. small mammals).

Although Sawtooth National Forest specifies weed-free hay, there is likely little if any oversight or enforcement- particularly since regions closely associated with Southern Divisions (e.g. Goose Creek Basin) produce hay contaminated by Noxious weeds and are feeding livestock that enter forest lands directly from private land as well as affected BLM land. It is highly unlikely that most (if any) permittees are actually "cleaning" out their cattle by feeding weed free hay or other forage for the minimum 2 days as recommended in your forest AOI's.

No language seems to appear in the 2015 or previous AOI's regarding washing or otherwise "de-weeding" vehicles used in the transport or herding of livestock on the forest, including ATV's or horse trailers- from which non-weed free hay or straw is likely being used/spilled along routes.

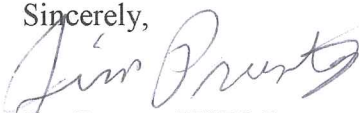
In addition to the most obvious weed vectors related to human activity (livestock, livestock vehicles), there are additional weed vectors or sources that should be analyzed as part of your weed control and planning process, including but not limited to recreational vehicles (e.g. RV's, mountain bikes, ATV's, passenger vehicles), fire vehicles (e.g. engines, bulldozers, helicopters), road maintenance equipment, and other project-related construction equipment.

Please consider the following specific types of issues as part of your planning process:

- **Weed Protection Oversight-** paper plans are always meaningless if there are no means included to achieve any planning oversight and to implement/enforce any of the stated planning objectives.
- **Exchanges of Weed Material-** with modern equipment frequently interchanged between divisions, between forests, and even between states and regions, the possibilities for weed introduction have dramatically increased. For example, aquatic weeds could easily be introduced by having a helicopter bucket scooping water from a local source such as Oakley Reservoir that had just recently scooped water from contaminated lakes or rivers in central or northern Idaho. A similar scenario holds true for introduction through contaminated road construction or fire vehicles- particularly when coming from closely adjacent lands such as around Boise or other lower Snake River Plain sites that are heavily contaminated by Rush Skeletonweed and Medusahead.
- **Pro-active Weed Identification and Control-** IDFG has implemented check stations to detect contaminated boats. Check stations that include a wash station could be similarly implemented for weeds in relation to local fires, heavy recreation periods (e.g. 4th of July, Labor or Memorial Day, Opening Day of hunting seasons) to help reduce introduction and possible establishment of Noxious weeds now highly common in other regions of Idaho (e.g. Yellow Star-thistle, Medusahead).
- **Public Education & Enforcement-** without planning for increased public education regarding weed issues and without creating a means to follow-up with and enforce existing rules (e.g. weed-free hay) or new rules (e.g. use of wash station for fire equipment, road maintenance equipment, ATV's), paper planning efforts will not lead to increased wildlife habitat quality or a reduction in the expansion of weed populations on Sawtooth or other National Forest lands in Idaho.

Thank you for your consideration of the above issues; please place a copy of my comments in your permanent weed planning project and/or forest file(s).

Sincerely,



Jim Prunty, USFS Ret.