



## WILDERNESS WATCH

*Keeping Wilderness Wild*

September 16, 2019

### Board of Directors

Gary Macfarlane, ID  
President

Franz Camenzind, WY  
Vice-President

Marty Almquist, MT  
Secretary-Treasurer

Talasi Brooks, ID

Louise Lasley, NM

Mark Peterson, WI

Cyndi Tuell, AZ

René Voss, CA

### Executive Director

George Nickas

### Advisory Council

Magalen Bryant

Dr. Derek Craighead

Dr. M. Rupert Cutler

Dr. Roderick Nash

### Minneapolis, MN Office

2833 43rd Avenue South  
Minneapolis, MN 55406

### Moscow, ID Office

P.O. Box 9623  
Moscow, ID 83843

Carey Case  
Project Leader  
Petersburg Ranger District  
PO Box 1328  
Petersburg AK 99833

RE: Central Tongass DEIS

Sent Via the Internet

Dear Project Leader Case:

The following comments on the Central Tongass Project are submitted on behalf Wilderness Watch. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. Our comments focus on the Wildernesses affected by this large proposal though other aspects of the proposal could have serious negative impacts to the Tongass National Forest.

### Wilderness

The DEIS states that the only activity proposed for Wilderness “is the treatment of invasive plants.” DEIS page 1.<sup>1</sup> While we appreciate the danger to native ecosystems that noxious weeds pose, the first question that the agency must address is whether this extensive, trammeling, weed control proposal, specifically the use of herbicides, is consistent with the Wilderness Act. Even before discussing issues of minimum required, the agency needs to evaluate whether a massive weed control program is even appropriate inside designated wilderness.

The DEIS itself suggests that the proposal for Wilderness is not needed. It states:

*All five wilderness areas are naturally functioning. The wilderness character baseline was established for the Kuiu, Petersburg Creek – Duncan Salt Chuck and Tebenkof Bay Wilderness Areas in 2018 according to the national standards. The baseline data indicates a stable trend in wilderness character. A baseline has not been established for the Stikine-LeConte and South Etolin Wilderness Areas therefore, no trends*

---

<sup>1</sup> Impacts from adjacent activities are also addressed in this comment letter.

*have been determined. At this time there are no significant impairments or noted concern with any of the qualities of wilderness character.*

DEIS at 375. However, the DEIS does not detail the expected amount of herbicide spraying in Wilderness, the duration of that spraying, or any past amount of herbicide spraying. Indeed, the DEIS indicates there is no annual or long-term treatment limit (DEIS at 45). The only information reported is gross acreages in Table 59, and it is an aggregate of herbicide, hand pulling and tarp treatments.

The DEIS (at 376) suggests that the trammeling impacts of broadcast spraying are lesser than that of tarping. That seems illogical as the persistence of herbicides can last much longer than the treatment and the DEIS recognizes no treatment limit (DEIS at 45). The use of herbicides can have serious and unintended consequences. Agencies have not done due diligence when proposing new herbicides in wildlands and elsewhere. See for example [https://missoulain.com/news/local/um-researchers-find-lack-of-government-accountability-on-widespread-herbicide/article\\_a13ac9e9-f535-51ef-a8ce-b398b6c29e62.html](https://missoulain.com/news/local/um-researchers-find-lack-of-government-accountability-on-widespread-herbicide/article_a13ac9e9-f535-51ef-a8ce-b398b6c29e62.html)

The DEIS analysis is flawed by the belief that wilderness character consists of five distinct qualities. The attached article by wilderness professionals points out that problem. Similarly, wildness or untrammled was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight “fundamental principles” for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, “Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness... Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness.”

As such, the agency needs to determine whether the activities proposed, especially herbicide spraying,<sup>2</sup> are even compatible with maintaining an “untrammled” (uncontrolled, untethered) environment and preserving wilderness character. While the spread of undesirable, non-native weeds inside Wilderness is disturbing and shows a clear failure of agency administration of human recreational use in wilderness (and a failure in administration of weeds outside of wilderness), determining whether herbicide use and an aggressive and manipulative program of going after weeds in the wilderness is appropriate. The question is the cure worse than the disease needs to be asked.

Furthermore, the DEIS must show how this proposal is different than what occurs outside of wilderness. Since wilderness is set aside to allow natural processes to determine the character of the area, weed control, if it is even consistent with the Wilderness Act, must be different than what occurs on the national forests outside of designated wilderness.

Another problem with the inadequacy of the DEIS is that it is likely there will be no site-specific NEPA analysis for the program in Wilderness. Rather, it seems the Forest Service intends to substitute an MRDG/MRA for NEPA compliance on a site-specific level.<sup>3</sup> The MRDG process is

---

<sup>2</sup> Hand pulling is generally noncontroversial and the DEIS notes that it has a low impact on the wildness or untrammled nature of Wilderness. Tarping is less controversial than herbicide spraying. Tarping and hand pulling, though trammeling, do treat Wilderness differently than herbicide spraying.

<sup>3</sup> The DEIS at 374 indicates a final MRA would be done prior to the decision. We could not find the preliminary MRA in the DEIS.

seriously flawed on its own let alone as an inappropriate replacement for site-specific NEPA analysis.<sup>4</sup> In any case, the public and presumably the Forest Service have not had the opportunity to review the MRDG/MRA documents that may be prepared in the future as part of this DEIS.

What is shown to be true is that prevention is the best way to control weeds. The DEIS pays little attention to this important aspect. In fact, the DEIS is not clear on how humans are spreading weeds. If the agency were truly concerned about weeds in the Wilderness it would consider:

- Require an inspection of all boats—including kayaks--before entering the wilderness.
- Require that all cabin sites, administrative sites, and the like will be made weed free within 5 years, or those sites will be closed to public and agency use until they are certified as weed free. Failure to keep a weed-free site would result in an automatic permit revocation.
- Implement campsite standards that will eliminate bare ground that serves as a ready site for weed invasion.

There may be other preventive measures that are warranted. Without a discussion in the DEIS as to specifically how humans are spreading weeds, it is hard to know what kind of measures would work. Again, if the agency is serious about attacking the noxious weeds, it will focus on preventative measures. To do otherwise makes all "back-end" controls futile. If weeds are a problem (and the DEIS suggests otherwise) it is because the agency has abdicated its duty by letting recreation and commercial interests drive wilderness administration rather than the mandates of the Wilderness Act.

The question needs to be asked if weed control outside the wilderness, which includes the entire arsenal of herbicides with little or no constraints, were successful, there would be no threat to the Wilderness from invasive weeds outside the wilderness because weeds would already be controlled or eradicated. We question whether this program will have any positive effect given the reality of weed control outside the Wilderness.

The DEIS admits activities next to Wilderness “would likely degrade” certain wilderness qualities. DEIS at 379. It then state, “Options to minimize these effects, such as timing restrictions, would be considered during project development.” However, these mitigating measures are not mentioned other than timing restrictions.

### **Other**

It is not clear to what degree the Wrangell-Petersburg Weed Management Project EA and Northern Tongass Weed Management EA overlap with this project. In essence, the DEIS is

---

<sup>4</sup> The MRDG process is based upon the wilderness character monitoring protocol that erroneously fragments wilderness character into qualities such as natural and untrammeled, and then seeing them in conflict with each other. Further, the MRDG two-step process ensures that untrammeled wilderness, the fundamental tenet of wilderness stewardship, will lose in step one before the weighing of tools occurs in step two. As noted earlier in our comment, we pointed out the importance of wildness or untrammeled Wilderness. Please see the attached document.

programmatic in nature and the site specific impacts are not revealed. This is especially true since there is no treatment limit.

Please keep us updated on this project. Send a copy of any documents and notification to Wilderness Watch at PO Box 9175, Missoula, MT 59807.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane". The signature is fluid and cursive, with the first name "Gary" and last name "Macfarlane" clearly distinguishable.

Gary Macfarlane  
President

Wilderness Watch, P.O. Box 9175, Missoula, MT 59807 (406) 542-2048  
[www.wildernesswatch.org](http://www.wildernesswatch.org)