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Organization: WildLands Defense

Title:

Comments: Sawtooth National Forest, Attn: Invasive Plants Project

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Dear Forest Service,

WildLands Defense is greatly concerned at the inadequate baseline data, lopsided analysis favoring extensive use of toxic chemicals, and inadequate range of alternatives in the Invasive Plants/Herbicide DEIS.

The Forest summarizes its effort as follows:

The overall purpose of the proposed action is to reduce the negative effects of existing and future invasive plants on the structure and function of native plant communities and on other natural resource values that may be adversely impacted. The proposal is to treat invasive plants on infested areas within the administrative boundaries of the Boise and Sawtooth NFs including the Sawtooth, Hemingway-Boulders, and White Clouds Wilderness Areas but excluding the Frank Church - River of No Return Wilderness Area, and including Forest Administrative sites (e.g. Ranger Station sites). Proposed control methods include biological control, such as pathogens, insects, and targeted grazing; chemical control using herbicides that target invasive plant species; and manual and mechanical techniques such as cutting and pulling. Activities would be implemented with partners at the federal, state, and local level where opportunities exist. Five alternatives are considered. The No Action alternative describes the consequences of no invasive plant treatments. Four action alternatives include the Current Management Alternative which identifies the use of biological controls; ground-based herbicide treatment; and mechanical/manual treatment methods; the Proposed Action (which is also the Preferred Alternative), which would utilize biological controls; aerial, aquatic, and ground-based herbicide treatment; and mechanical/manual treatment methods; the No Aerial Herbicide Application Alternative; and the No Aquatic Herbicide Application Alternative.

If the purpose is to reduce negative effects of invasive plants on the structure and function of native plant communities - then the Forest must consider a greatly expanded range of alternatives that reduce, diminish, minimize and/or eliminate significant disturbance activities in cheatgrass-vulnerable and other exotic species susceptible sites.

A greatly revised EIS must include much greater controls on grazing disturbance and/or removal of disturbance from the most "At Risk" weed vulnerable sites. An example is removal/large-scale reductions in livestock grazing disturbance and very harmful weed-causing trampling disturbance from important sage-grouse and other sensitive species habitats in the Goose Creek watershed in the Minidoka RD. Those lands are currently being torn to pieces by severe grazing impacts, gross overstocking, inadequate controls on use, and minimal and biased USFS monitoring that greatly favors permittee interests at the expense of protection of crucial sage-grouse habitats. The grazing damage is promoting rapid expansion of cheatgrass into the upland habitats, and weeds like white top are choking the margins of the dying sprigs and meadows.. Plus those lands are also treaty threatened by a massive scorched earth deforestation proposal that appears to be a distraction from the pressing need to address grazing damage.

The COMBINED effects of the severe grazing disturbance by politically powerful permittees and the scorched earth proceed treatments will result in a profusion of weeds, and the Forest is likely to futilely douse lands with

herbicides - rather than actually working to mend and deal these vital habitats.

A reasonable range of alternatives must limit not only grazing disturbance impacts and grazing's "hoof print, but also the type and manner of vegetation manipulation, treatments, and/or logging that can take place. Seinfeld et al. 2006.

These reductions and/or removal of disturbance activities are essential to allow vegetation communities to help prevent weed expansion and buffer lands, watersheds, sensitive species and important recreational and cultural sites from the serious adverse effects of climate change.

Sadly, the EIS fails to do provide necessary baseline data and sound analysis of all direct indirect and cumulative adverse effects of use of the arsenal of chemical and other techniques.

We are concerned that the Forest embraces much of the battery of harmful and toxic herbicides used by the BLM, and the same deleterious methods of use with inadequate laundry lists of BMPs, SOPs, and loose and highly uncertain so-called "adaptive management".

The old BLM Chemical Risk assessments are severely flawed. They are largely old, and based on minimal data. The Forest must conduct new risk assessments for all chemicals it proposes to use.

The Forest mis-characterizes the No Action alternative, as the Forest has been spraying toxic herbicide all along. When, where, how much, what chemicals, and what are the disturbance activities taking place in lands where herbicides have been used? Who applied them? How much has it cost? How has this been done? Have County weed Boards or "Co-op" groups been used to cover it up? We are very concerned that this may allow chemicals to pass into untrained hands or be used inappropriately.

The Forest lacks an adequate baseline on the ecological condition of the affected lands - including the damaging footprint of grazing, logging and treatment disturbances on upland and riparian areas and sensitive and imperiled species habitats. This has resulted in a situation where the Forest cannot even begin to select a balanced and suitable range of alternatives. It is alarming that the agency would consider drastic measures such as applying herbicides to large acreages or an aerial herbicide assault under these circumstances.

We hope to submit additional comments.

Please fully consider all concerns raised on the use of toxic herbicides in the Attached recent WLD comments to BLM on more chemicals that agency has just added. These chemicals are risky and dangerous, and the forest must develop a range of actions that effectively minimize and mitigate their use. The DEIS has not done so. This leaves the lands highly vulnerable to irreversible weed invasions and loss of sustainability of ecological values (water, wildlife, aquatic species, recreational values) in the face of the hotter, drier, more extreme weather conditions foreseeable under climate change. A Supplemental EIS is thus necessary.

Please let me know you have received these comments.

Thank you,

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