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First name: Katie

Last name: Fite

Organization:

Title:

Comments: Sawtooth Invasive Plants

Dear Forest Service,

Here is a comment of WildLands Defense and Prairie Falcon Audubon on the Sawtooth and Boise Forests Invasive Plants/Weed DEIS.

Please apply all concerns in this recent submission to BLM on toxic chemical herbicides to all relevant elements of the current Sawtooth and Boise Forests Invasive Plant DEIS.

We are alarmed at the Forest in 2016 relying on the same old, outdated, minimal and deficient risk assessments in the EIS. The Forest tries to conceal the inadequacy of these assessments in hundreds of pages of self-serving "analysis". The analysis fundamentally ignores the dangers of the arsenal of existing and expanded chemicals that the severely flawed EIS would impose. It's as if Forest is unaware of all the ever-mounting scientific information on harms from pesticides - which herbicides are. This ranges from harms to pollinators to harms to human health.

Given the serious drift problems with aerial herbicide in Oregon forests and elsewhere - the Proposed Action should never be seriously considered in a 2016 Forest Invasive Species proposal.

We are alarmed that the Forest proposes to dramatically increase the land area "treated" both jun and outside burned areas; impose a massive aerial spraying assault on remote, rugged wild land country with highly changeable weather and great risk of drift and collateral damage to non-target species including sensitive and ESA-listed species; continue to use highly toxic Tordon, Round Up, Plateau, and even Oust; legitimize adding any and all new toxic herbicides to its arsenal of dangerous chemicals with minimal and cursory oversight (for example, the dangerous chemicals addressed in WLD's Attached comments); and rely over-whelmingly on chemical poisons while minimizing manual and other treatments.

We are alarmed at the greatly deficient and mis-leading analysis of alternatives. The Forest created "straw man" alternatives - like claiming No Action is no treatment, or merely splitting off aquatic use vs aerial use. Under no alternatives is an Integrated Weed Management approach that effectively incorporates addressing weed causes. The Forest merely olds along with the same Spray and Walk Away approach that has not been effective to address invasive species problems in the past.

Even with the limited so-called "integrated" and/or "adaptive" actions the Forest proposes to under-take, nothing is required. DEIS language used is full of highly uncertain and non-binding "weasel words".

We are alarmed that the Forest ignores any valid baseline (even ignoring an honest assessment of lands

occupied by cheatgrass), and assessment of alternative and mitigation actions to address the causes of weeds. Causes of weeds across the landscape are large-scale livestock grazing, incessant treatment disturbance, and logging. Fire and climate change interact with, and amplify the effects of this UNNATURAL domestic livestock grazing, logging, and agency "treatment" disturbance.

We are alarmed that the Forest analysis lacks essential baseline data on the effectiveness of all the chemicals it has used in the past. The fact that the Forest now claims there is a sudden "need" for massive and very expensive expansion of chemical use across Forest lands demonstrates resoundingly that the Forest must address the causal factors of weeds. The agency can not continue to recklessly poison the land, air, water and habitats for native plant and animal species - while allowing large-scale abusive grazing, treatments and logging to continue generate more and more and more weeds.

The Adaptive Management scheme will never be effective. Our experience with the Minidoka RD for example for decades has shown that the Forest Ranger always complains about not enough staff to monitor grazing impacts, and that the manner in which impacts are claimed to be monitored on paper are often ignored on the ground.

A Supplemental EIS that presents a solid current 2016 baseline, and actually takes a hard look at addressing causal factors of weeds as well as the dangers and often there futility of using massive amounts of chemical herbicides on Forest lands must be prepared.

We will be submitting additional comments.

Thank you,
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Katie Fite
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

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Julie Randell
Prairie Falcon Audubon
Conservation Chair
3952 North 3600 East
Kimberley, ID 83341