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First name: Rob

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Organization: Council for the Bighorn Range

Title:

Comments: USDA Forest Rocky Mountain Region

Attn. Reviewing Officer

1617 Cole Blvd., Bldg 17

Lakewood, CO

Re: Objections to the final decision for Invasive and Other Select Plant Management for the Bighorn National Forest.

Dear Reviewing Officer

According to 36 CFR 218, The Council for the Bighorn Range files this objection to Bighorn National Forest Supervisor Andrew Johnson's Draft Record of Decision for Invasive and Other Plant Management for the Bighorn National Forest. On August 9, 2021, the Council for Bighorn Range Commented on the Draft EIS.

The Council for the Bighorn Range asked The Bighorn National Forest (BNF) to consider the herbicide treatment sagebrush, particularly mountain big sagebrush plant species, as an alternative separate from invasive species to better the ecology of the Bighorn NF. The comparison of Alternatives presented in them is virtually a non-starter. Alternative 1, with no change, is a requirement under NEPA. Alternative 3, all the changes present in other areas of EIS except the aerial application of herbicides are untenable given that virtually every National Forest in the region has adopted the method.

The response to our comment was the actions to combine both invasive treatments and control of native species are complementary actions. Limiting the growth and spread of invasive plants.

1. Our objection goes back to the 2005 Forest Plan with its target treatment of 2000 or more acres a year for mountain big sagebrush on about 40% of its range across the BNF. That target was set on the accessibility to mowing, burning, wheeled or manual equipment. . The BNF has not come close to the affected acreage since 2005.

The EIS allows the BNF to triple the treatment across the mountain big sagebrush habitat far beyond the 2005 Forest Plan and avoid site-specific NEPA analysis and disclosure before they make decisions that make site-specific consequences. The BNF does not do that with timber, grazing, water, or recreation. When this EIS is implemented, there is no requirement for the BNF, when it makes its recommendations to the Implementation Team, to address the public what they see across the project area as they would if the project was in an EA. An Environmental Analysis (EA) at the project level can stand independently. It is not a necessary NEPA off-ramp from an EIS.

The Council for the Bighorn Range recognized the treatment of mountain big sagebrush across the scoping and then the Draft EIS as it exists in the 2005 Forest Plan. There is a concern that prescribed burning, mowing, and herbicide treatments that target mountain big sagebrush may alter sagebrush so that wildlife habitat and other ecosystem functions are compromised. Of particular concern is the potential for treatments to favor grass-dominated rangelands, which may negatively affect species that depend on higher abundance and density of mountain big sagebrush and forbs.

Significant population declines in USFS Region 2 (R2) Forest Service lands of sagebrush obligate call for a reassessment of treatment programs. Using herbicides on sagebrush will reduce habitat biodiversity in bird species and total birds (Welch 2002). Burning, plowing, and mowing have the same effect.

The BNF 2003 DEIS showed an increase in sagebrush cover from 1921 to 2001 of 3%. The loss of potential grassland from lodgepole pine spread was nearly 60% in those same years. Sagebrush stands are only second to riparian areas of the Bighorn National Forest for organisms from the most microscopic to the large mammals. What have we learned since our comments? First, the Bighorn National Forest (BNF) still is an outlier in significant modifications to its mountain big sagebrush habitat among the other federal land managers. The species cited in our comments on BNF continue to decline across the region. No agency or industry has demonstrated that the aerial application of herbicides mimics more natural modifications like controlled fire toward the BNF desired conditions. The BNF fails to perform site-specific analysis where required and is

essential for informed decision-making. So many unknowns across a complete 15% of the acres across the BNF. The BNF, in its decision, leaves it all to condition-based management.

2. Our second objection centers on the use of condition-based management. The condition-based management under this EIS on native plant management is an approach where the BNF postpones identifying or disclosing site-specific analysis and identifies what will characterize the types of sites the agency wishes to act on. Using condition-based management (CBM) proposes an action of varying project variables and mitigation techniques. Then, telling the public and stakeholders we "need another tool in our toolbox," conducts a broad EIS to cover every possible case in an EIS without disclosing where or when actions will occur.

The documents in this EIS on the native plants NEPA public participation do not provide site-specific information, analysis, comparisons of alternatives, or mitigation because none exists when this document has moved to a final form. The ambiguity about the actions' actual location, concentration, and timing fails to provide a meaningful comparison of alternatives.

The BNF is using the Implementation Team as an ad-hoc, post-decisional phase from now on without a public participation process that contains no formal binding requirements on the agency, unlike the specific NEPA provisions for public participation

Remedy.

As the Council for the Bighorn Range has maintained the Bighorn National Forest since the inception of the EIS, the garbling together of both the update of the invasive plant management and the big mountain sagebrush and other native plants such as larkspur skirted the NEPA, and the only remedy is segregate the two issues. If the 2005 Forest plan did not adequately address the management of native plants on the BNF, then an environmental analysis may have been warranted to address the actual conditions and examine remedies that warrant its own EIS

The other National Forests in Wyoming were able to meet the region's goal of creating a modern EIS that addressed preventing and reducing the loss of native plant species and updating the use of chemicals for occupational safety and significant environmental concerns in their use.

Sincerely,

Rob Davidson

President,

Council for the Bighorn Range.