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Organization:

Title:

Comments: Invasive and Noxious Species(INS)

The desired conditions statement is laudable, however the objectives, particularly 01, do not appear to match the desired conditions.

"Desired Conditions (INS-DC)

Invasive and noxious species are present at population levels that do not disrupt ecological functionality, affect the sustainability of native species, cause economic harm, or negatively impact human health."

"Objectives (INS-O)

01 Treat and control invasive and noxious species on 200-1,500 acres annually.

02 Treat and control invasive species on 2 - 10 stream reaches every five years."

Given that Red brome already covers much of the Sonoran desert areas or Lower Scrublands, and that fountain grass is already in many of the washes and that buffelgrass is increasingly present and expanding rapidly, it is highly unlikely that treat and control of 200-1,500 acres annually will have an effect on the threats of these and other invasive species.

In order to realistically establish the Objectives, it is necessary for the Forest Service to determine the current extent of the problem either in acres or percent coverage. The Forest Service then needs to estimate the rate of expansion of these invasive species. That information should be published in the plan in order to support the realism of the objectives.