United States
Department of
Agriculture

Forest
Service

Intermountain
Region

September 2006

Wasatch-Cache National Forest Noxious Weed Treatment Program

Final Environmental Impact Statement (Errata to the Draft Environmental Impact Statement)

Box Elder, Cache, Davis, Duchesne, Morgan, Rich, Salt Lake, Summit, Tooele, Wasatch, and Weber Counties, Utah

Uinta County, Wyoming

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WASATCH-CACHE NATIONAL FOREST
NOXIOUS WEED TREATMENT PROGRAM
Final Environmental Impact Statement
Box Elder, Cache, Davis, Duchesne, Morgan, Rich, Salt Lake, Summit, Tooele, Wasatch, and Weber Counties, Utah

Uinta County, Wyoming

September 2006

Lead Agency:	**USDA Forest Service**
Cooperating Agencies:	**N/A**
Responsible Officials:	**Faye Kreuger** **Forest Supervisor** **Wasatch-Cache National Forest** **8236 Federal Building** **125 S. State Street** **Salt Lake City, UT 84138**
For Information Contact:	**Michael Duncan** **Wasatch-Cache National Forest** **8236 Federal Building** **125 S. State Street** **Salt Lake City, UT 84138**

Abstract: The U.S. Forest Service, Intermountain Region, proposes to treat noxious weeds on about 1,600 acres annually within 1.2 million acres of Wilderness and non-Wilderness areas on the Wasatch-Cache National Forest (W-CNF). The project addresses existing and future potential noxious weed infestations. This Final Environmental Impact Statement (EIS) describes and analyzes the effects, in detail, of three alternatives. The Proposed Action is Alternative 2, which provides noxious weed treatment using the most effective methods available, balanced on a site-by-site basis while reducing potential impacts to sensitive resources. Alternative 1 represents no change in existing management, and Alternative 3 provides noxious weed treatment using methods other than herbicides, including mechanical, controlled grazing, and biological agents.

This is a "short form" Final EIS permitted under the CEQ Regulations for implementing the National Environmental Policy Act (NEPA). These regulations state: "If changes in responses to comments are minor and are confined to the responses described in paragraphs (a)(4) and (5) of this section, agencies may write them on errata sheets and attach them to the statement instead of rewriting the draft statement" (40 CFR 1503.4 [c]). This "short form" Final EIS is also consistent with CEQ regulation for reducing paperwork (40 CFR 1500.4[m]).

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Final Environmental Impact Statement

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APPENDIX E

Errata

The following errata summarizes clarifications, updates, and/or corrections made to the Wasatch-Cache National Forest Noxious Weed Treatment Program Draft Environmental Impact Statement (DEIS) (2006). An errata is appropriate for a Final Environmental Impact Statement (FEIS) that has minor changes from the DEIS (40 CFR 1503.4[c]). The organization of the errata items follows the formatting in the DEIS.

Executive Summary

Page ES-2: *Factors in Weed Treatment*. Add the following sentence to the end of the last paragraph:

"Monitoring, as described in Appendix F, would be used to determine the effectiveness and appropriateness of applied treatments and restoration of treated sites."

Page ES-17: *Decisions to be Made*. Replace last sentence on page with the following sentence:

"In addition, the Forest Service will decide what, if any, treatment methods will be allowed within wilderness."

Chapter 1—Purpose and Need

Page 1-14: *Monitoring and Restoration*. Replace first paragraph on page with the following paragraph:

"A monitoring program would be implemented as part of the proposed project to monitor the application and effectiveness of the applied treatments. Monitoring results, combined with the Decision Tree (Figure 1-3) and the adaptive management approach described below in Section 1.4.3.3, would guide the future application of treatments by building on the experience gained through prior treatment applications. Appendix F presents monitoring activities to be included as part of the proposed project's design."

Page 1-18: *Decisions to be Made*. Replace last sentence on page with the following sentence:

"In addition, the Forest Service will decide what, if any, treatment methods will be allowed within wilderness."

Chapter 2—Alternatives, Including the Proposed Action

No changes are proposed for Chapter 2.

Chapter 3—Affected Environment

No changes are proposed for Chapter 3.

Chapter 4—Environmental Consequences

Surface Water and Groundwater Quality

Page 4-76 (in Section 4.3.2.2): Replace last sentence of first (partial) paragraph on page 4-76 with:

"Resultant concentrations in tributaries to the Ogden River or any other drainage on the W-CNF that receive this same amount of 2,4-D from a runoff-dominated site over a 6-hour period would exceed the State of Utah's drinking water standard if flow is less than 70 cfs."

Page 4-76 (in Section 4.3.2.2, *Low Flow Watersheds* subsection): Following the "Low Flow Watersheds" subsection heading, and the first paragraph, add the following text as the second paragraph:

"The following examples are for a single day, one-time herbicide application at a concentration suitable for successfully treating the target weed species. The single day, one-time application would prevent the potential problem of accumulation of residual herbicides at the soil surface from previous treatments."

Page 4-127 (in Section 4.4.6): Delete the paragraph following the bullets.

Page 4-129 (in Section 4.4.6.2): Replace the title of the alternative with:

"Alternative 2 – Proposed Action"

Replace in first paragraph, first sentence; and in second paragraph, second sentence:

". . .Idaho SHPO. . ." with ". . .Utah and Wyoming SHPO. . ."

Page 4-130 (in Section 4.4.6.2): Change the first sentence to read:

"…prior to any mechanical treatment or grazing activities."

Replace in fourth paragraph, first sentence:

". . .Idaho SHPO. . ." with ". . .Utah and Wyoming SHPO. . ."

"…field associated…" with "…mechanical treatment or grazing…"

Page 4-131 (in Section 4.4.6.3): Replace the title of the alternative with:

"Alternative 3 – Weed Treatment Excluding Herbicide"

Page 4-131 (in Section 4.4.6.4): Delete Alternative D

Chapter 5—List of Recipients

Page 5-1: Change "DEIS" in first heading to "FEIS."

Page 5-2: *Individuals and Businesses.* The following individuals and businesses were added to the list:

B. Sachau

Chapter 6—Literature Cited

No changes are proposed for Chapter 6.

Chapter 7—Acronyms and Abbreviations

No changes are proposed for Chapter 7.

Chapter 8—Glossary

No changes are proposed for Chapter 8.

Chapter 9—List of Preparers

No changes are proposed for Chapter 9.

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Appendix F

Monitoring Plan

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APPENDIX F

Monitoring Plan

Implementation monitoring would be performed during treatment application and recorded on a pesticide application report to indicate that the appropriate treatment application standards and mitigation measures were followed. Samples of the treated sites and all restored sites would be monitored for effectiveness through field checks to determine the following:

- Whether the desired management objectives of eradicating, controlling, or containing aggressive weeds were achieved; and if not, what follow-up treatments would be necessary to achieve objectives;
- Whether site restoration techniques have resulted in the re-establishment of native plants; and if not, what follow-up treatments would be necessary to achieve establishment; and
- Whether the native vegetation has adequately responded in non-restored treatment areas to provide for adequate site protection; and, if not, what follow-up restoration treatments are necessary.

Treatment method and date, target species, and monitoring results are recorded for each monitored treatment site to compile a long-term database for treatment effectiveness under various conditions.

Herbicide applications adjacent to sensitive resources (streams, sensitive plants, amphibian breeding areas, etc) will be monitored to determine the amount and distribution of spray drift. Monitoring herbicides application, including drift detection at selected sites, will include the following activities:

- Spray detection cards will be placed on the perimeter of the treatment area and inside the buffer around sensitive areas. The cards will be visually examined and photographed immediately after spraying.
- A written summary will document the drift pattern as interpreted from the detection cards and the photos.
- For broadcast spraying, selected sites will be monitored for runoff by observing if surface erosion leading to a water body is present. Indicators of surface erosion are rilling and sediment deposition. Whenever there is reason to suspect that herbicides may have entered the stream during the spraying operation, water samples will be collected immediately after spraying. Laboratory analysis by an independent lab will test the water samples for herbicides.

If necessary, the application methodology will be modified.

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Appendix G

Comment Letters and Responses to Public Comments on the Wasatch-Cache National Forest Noxious Weed Treatment Program Draft EIS

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APPENDIX G

Comment Letters and Responses to Public Comments on the Wasatch-Cache National Forest Noxious Weed Treatment Program Draft EIS

TABLE G-1
Draft EIS Comment Letters

Reference Number	Source of Letter
Section 1—Federal, State, Local, and Tribal Governments	
1	Bill Wichers, Deputy Director, Wyoming Game and Fish Department
2	Robert F. Stewart, Regional Environmental Officer, U.S. Department of the Interior
3	Larry Svoboda, Director, NEPA Program, Office of Ecosystems Protection and Remediation, Environmental Protection Agency, Region 8
Section 2—Other Interested Parties	
4	B. Sachau

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Section 1

Federal, State, Local, and Tribal Governments

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Comment Letter No. 1

WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4610

Web site: http://gf.state.wy.us

GOVERNOR
DAVE FREUDENTHAL

DIRECTOR
TERRY CLEVELAND

COMMISSIONERS
RON LOVERCHECK – President
BILL WILLIAMS, DVM – Vice President
LINDA FLEMING
CLARK ALLAN
JERRY GALLES
CLIFFORD KIRK
KERRY POWERS

April 14, 2006

1

WER 7825
Wasatch-Cache National Forest
Draft Environmental Impact Statement
Noxious Weed Treatment Program

Mike Duncan
Wasatch-Cache National Forest
125 South State Street
Federal Building Room 8236
Salt Lake City, UT 84138

Dear Mr. Duncan:

The staff of the Wyoming Game and Fish Department has reviewed the Draft Environmental Impact Statement for the Noxious Weed Treatment Program for the Wasatch-Cache National Forest. We support this DEIS as it is currently written. 1.1

Thank you for the opportunity to comment.

Sincerely,

for BILL WICHERS
DEPUTY DIRECTOR

BW:VS:gfb
cc: USFWS

"Conserving Wildlife - Serving People"

Page 1 of 1

1.1 Your review and support of the DEIS is noted.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 56, Room 1003
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

TAKE PRIDE IN AMERICA

April 21, 2006

ER 06/211
9043.1

Faye Kreuger, Forest Supervisor
Wasatch-Cache National Forest
8236 Federal Building
125 S. State Street
Salt Lake City, UT 84138
ATTN: Melissa Blackwell

Dear Ms. Kreuger:

The Department of the Interior (Department) has reviewed the draft environmental impact statement (DEIS) for the Wasatch-Cache National Forest Noxious Weed treatment Program, Wasatch-Cache National Forest and offers the following comments.

Page 4-76, Section 4.3.2.2 Alternative 2: Proposed Action, first partial paragraph, last sentence - It is suggested that the last sentence be reworded to indicate that the resultant concentration would exceed the Utah drinking water standard for 2-4,D "if the flow is *less than* 70 cfs." Alternatively, the sentence could state that flows must exceed 481 cfs to dilute this much herbicide to below the standard. 2.1

Page 4-76, Section 4.3.2.2 Alternative 2: Proposed Action, last full paragraph, third sentence - An additional variable should be introduced into the calculation of the maximum number of acres per day that could be treated without exceeding drinking water standards. Pesticide could reside at the soil surface until there was a rainstorm to mobilize it, at which time the residual from several days' application would be delivered to the stream. Therefore, this analysis may have identified the maximum number of acres that could be treated between rainstorms, rather than per day. 2.2

We appreciate the opportunity to provide these comments. If you have any questions concerning our comments, please contact Lloyd Woosley of the USGS Environmental Affairs Program, at (703) 648-5028 or at **lwoosley@usgs.gov**.

Sincerely,

Robert F. Stewart
Regional Environmental Officer

2.1 The referenced sentence will be corrected as you suggest, stating "if the flow is less than 70 cfs."

2.2 This example analysis is for a single day, one-time herbicide application at a concentration suitable for successfully treating the target weed species. Because of this, there would not be consecutive days of treatment and therefore no potential for accumulation of residual herbicide at the soil surface from previous treatments. The referenced paragraph will be revised to make this clear to the reader.

Comment Letter No. 3

======

May 18, 2006

Ref: EPR-N

Mike Duncan
Forest Botanist
Wasatch-Cache National Forest
8236 Federal Building
125 South State Street
Salt Lake City, UT 84138

Re: Wasatch Cache National Forest
Noxious and Invasive Weed Treatment
Project - Draft EIS
CEQ 20060075

Dear Mr. Duncan:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Wasatch Cache National Forest Noxious and Invasive Weed Treatment Project - Draft Environmental Impact Statement (DEIS) on the Wasatch Cache National Forest (WCNF). With this project the US Forest Service (USFS) proposes to treat noxious weeds on 1.2 million acres of wilderness and non-wilderness areas. The project addresses existing and future potential noxious weed infestations.

The EPA concurs with the need in the WCNF for an expanded integrated weed management program to prevent the establishment and spread of noxious weeds. The EPA commends proposed efforts to address invasive weed infestations before weed problems become an epidemic. Noxious weeds are a great threat to biodiversity, and can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Impacts to native plant communities are much reduced when control actions are taken at an early stage of invasion.

Integrated Weed Management

We support proposed integrated weed management methods in the preferred alternative, Alternative 2, and we recognize that aerial application of herbicides facilitates effective weed management where there are large areas of weed infestation across inaccessible terrain. We do consider it important, however, to ensure that adequate measures are incorporated into aerial applications to mitigate risks of adverse health and environmental effects (e.g., avoid drift of potentially toxic herbicides to aquatic areas or other sensitive areas). The environmental protection measures included Section 2.3.7.4 appear to recognize the need to avoid drift of herbicides to non-target areas. EPA is pleased to see that consideration has been given to assuring the accuracy and safety of aerial pesticide applications. 3.1

An Integrated Weed Management program should also strive to identify the reason(s) why noxious and invasive weeds are present. We therefore suggest adding a discussion to Section 3.3.1.3.1 on the probable causes of noxious and invasive weed establishments within each Management Zone on the Forest (i.e. logging practices, grazing 3.2 cont.

3.1 Your support of integrated weed management methods contained in the Proposed Action (Alternative 2) and the use of environmental protection measures in the accurate and safe aerial application of herbicides (described in DEIS Section 2.3.7.4) is noted.

3.2 Identification of potential specific causes would be part of the integrated weed management approach, as weed inventories are updated annually. The Forest Service employs standard BMPs for different activities on the W-CNF to prevent or minimize the potential for weed introduction and spread.

practices, recreational activities, erosion, etc.). By describing why weeds have become a problem, the Forest may be better able to apply strategies to mitigate root causes. 3.2 cont.

Monitoring and Adaptive Management

The DEIS does not include a monitoring and adaptive management program to guide management actions and assess effectiveness of the Treatment Program. We recommend that a strong monitoring and adaptive management program be added in the Final EIS that includes monitoring of the density and rate of spread and effects of invasive plants on natural resources; effectiveness of herbicides and biological control agents; and the presence of herbicides in surface and ground water in high risk areas. It is important to have an adaptive management program that monitors treatment activities and effects to document effective weed treatment with minimal impacts on non-target species, and to avoid other adverse environmental or public health effects. We encourage the Forest to track weed infestations, control actions, and effectiveness of control action in a Forest-level weed database. 3.3

It is important that monitoring of water samples is included to detect the presence of herbicides from drift, leaching or runoff. This monitoring would typically be targeted at higher risk practices (e.g. aerial application), larger scale treatments, treatment adjacent to a sensitive community (e.g. aquatic or plant communities deserving extra protection), or use of particularly mobile, toxic or persistent herbicides. The Forest may also want to consider groundwater monitoring in selected wells in close proximity to larger application sites. 3.4

Aquatic monitoring is an important element of an effective weed management program utilizing herbicides to validate that herbicide application protocols and environmental protection measures are effective in preventing herbicide transport to surface and ground waters. Such monitoring should increase public confidence that chemical contamination of surface waters does not occur. Herbicide presence in water can affect aquatic ecosystem function even when present at levels below human health standards. We do recommend that additional information be provided regarding monitoring for herbicides to validate effectiveness of environmental protection measures (see enclosure). The Forest may also want to consider monitoring for herbicide concentrations in soils, and soil microbiologic assays or assessments of soil fertility. We also recommend that information be disclosed in the FEIS showing aquatic toxicity of the proposed herbicides for the fish species present in the areas to be treated. 3.5

The health of downstream domestic, agricultural and recreational water users and of the aquatic ecosystem should dictate some level of aquatics monitoring to document and verify that aqueous transport of herbicides does not occur. Picloram and clopyralid should be prioritzed for monitoring as they are highly soluble and mobile. Such monitoring will also verify that mitigation measures were effective in avoiding herbicide drift to streams and wetlands, and may increase public confidence that chemical contamination of surface waters did not occur. 3.6

EPA Rating

Based primarily on the lack of a monitoring and adaptive management program to assure that program objectives are met while

3.3 The DEIS includes an adaptive management and monitoring discussion for selecting the appropriate weed treatment method and for assessing weed treatment implementation and weed treatment effectiveness. Much of this discussion is presented in Chapter 1 in Section 1.4, *Proposed Action*, under the headings Section 1.4.3.2, *Monitoring and Restoration*, and Section 1.4.3.3, *Treatment Selection for Potential Future Infestations– Adaptive Approach*. The Decision Tree (Figure 1-3) and the Treatment Options Table (Appendix C) in the DEIS are cited as tools to be used in the adaptive approach to weed management to avoid or minimize risk to sensitive resources. Sections 2.3.6 and 2.3.7 in Chapter 2 contain extensive lists of management practices and mitigation measures that would be implemented to avoid or minimize the potential for adverse effects. Monitoring for the presence of herbicides as suggested by the EPA is discussed in the response to comment 3.4.

3.4 Appendix F of the Final EIS (FEIS) describes the monitoring program for the presence of herbicides that the W-CNF will establish and implement as an integral part of the proposed project.

We have chosen not to monitor the effects of herbicide applications on soil quality and/or condition. We concluded that our proposed use of herbicides is very unlikely to result in a reduction soil quality/productivity as measured by the ability of the soil to support native vegetation. For soil productivity to be diminished, over the long term, herbicides would need to be persistent within the soil year after year. Herbicide use, as proposed to occur on the W-CNF, will be conducted under methodology and rationale that minimizes the use of known persistent herbicides such as picloram or imazipur. The Decision Tree and other rationale directs us to use these agents only when less toxic and persistent agents are ineffective in controlling the target weed species. Also, unlike agricultural applications, herbicide treatments on the national forest are not likely to be repeated year after year. In this case, herbicides are not likely to persist at concentrations in the soil toxicity to plants for more than the growing season they are applied in. For more persistent herbicides, these are likely to be naturally attenuated and broken down into less harmful components well before the next herbicide application occurs. Finally, all herbicides will be applied at concentrations no greater than specified in their label, which further reduces the possibility of making the soil infertile from these applications.

3.5 The risk quotient analysis presented in Section 4.2.2.2 of the DEIS is based on aquatic toxicity data for all seven herbicides proposed for use on the W-CNF. Rainbow trout is the most commonly tested salmonid in aquatic toxicity tests and is considered an appropriate surrogate for cold-water species found within the project area. Analyzing the effects of the proposed herbicides on this representative cold-water species provides a method for equally weighing and comparing potential impacts of the proposed project on aquatic resources because the species response information is available for all proposed herbicides. Toxicity test results for the proposed herbicides were not available for any of the Forest Service Sensitive or Federally listed species on the W-CNF.

3.6 Please see the response to comment 3.4 and Appendix F of the FEIS regarding monitoring aquatic resources for the presence of herbicides.

protecting environmental resources and human health, EPA has issued a rating of EC-2 (Environmental Concerns - Insufficient Information). The "EC" rating indicates that the EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative, or application of mitigation measures or actions that can reduce these impacts. The "2" indicates that EPA has identified additional information, data, analyses or discussion should be included in the Final EIS. A full description of EPA's EIS rating system is enclosed.

We appreciate the opportunity to review this project. EPA's review of the Wasatch Cache National Forest Noxious and Invasive Weed Treatment Project is being coordinated by Phil Strobel (303 312-6704) of my staff.
Please feel free to contact Phil or me at (303) 312-6004 regarding these comments.

Sincerely,

/s/

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation

Enclosure

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Section 2

Other Interested Parties

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Comment Letter No. 4

Melissa Blackwell/R4/USDAFS
04/17/2006 04:54 AM

To: Julie Hubbard/R4/USDAFS@FSNOTES, Michael G Duncan/R4/USDAFS@FSNOTES, Wayne Padgett/R4/USDAFS@FSNOTES
cc:
bcc:
Subject: Fw: public comment on wasatch cache national forest noxious weed treatment deis o

Just want to make sure you have the below comments on the Weed EIS.

Melissa Blackwell
Regional Natural Resource Planner
Intermountain Region

phone: 801-625-5275
e-mail: mblackwell@fs.fed.us

----- Forwarded by Melissa Blackwell/R4/USDAFS on 04/17/2006 06:54 AM -----

Bk1492@aol.com
04/15/2006 05:51 AM

To: mblackwell@fs.fed.us, faye.kreuger@fs.fed.us, melissa.blackwell@fs.fed.us
cc: rodney.frelinghuysen@mail.house.gov
Subject: public comment on wasatch cache national forest noxious weed treatment deis o

for march 2006

the biggest noxious weed here is the propensity of the forest service to blanket u.s. national taxpayer owned property with toxic chemical poison. dont forget the chemical companies also told us agent orange didnt harm or injure people, but it does. the toxic chemical companies have done this over and over and washington bureaucrats are approving chemicals that should never be approved because of lots of lobbying money in corrupt washington. this influences what gets sold these days, not human health. the toxic chemical mfrs lie and decive on the toxicity of their products. forest service should not be taken in and poison americans. 4.1

The grazing that is being allowed also causes invasive weeds to proliferate and grazing must be stopped. letting national taxpayer owned land be leased for $1.25 per acre per year is such a ripoff of the national taxpayer, particularly in terms of the way the land is decimated from grazing. the cattle barons are doing a number on national taxpayers, ripping them off and decimating the land they own. 4.2

Birds/wildlife/butterflies,bees, etc. are harmed/killed with this toxic chemical spraying. 4.3

I oppose biological agents. I dont need to tell forest service abouit the endless invasive insects which were brought in and caused their own gigantic problems in the us. the moth brought in became a favorite food of mice, which then proliferated and cause hantavirus - all to be laid at the doorstep of those favoring biological treatments. it is clear we need to steer away from biological treatments since they are so subject to error. 4.4

the drought in this area for the past years is why growth is at l4%. wonder why drought has been left out of the equation and calculation of why growth is slow? 4.5

USDA, principal manager of the forest service, has allowed invasive beetles to enter the u.s. usda is

4.1 Your opposition to the use of chemicals for treating noxious weeds is noted. As described on page 2-14 of the DEIS, herbicides are extensively screened and tested before they are approved and registered for use by the U.S. Environmental Protection Agency (EPA). Such registrations typically require at least 120 tests over a 7- to 10-year period and can cost approximately $30 million to $50 million. Herbicide labels carry the force of laws governed by federal and state agencies. Labels contain information about the proper administration of each herbicide, including the following: a list of the ingredients; EPA registration number; precautionary statements (hazards to humans and domestic animals, personal protective equipment, user safety recommendations, first aid, and environmental hazards); directions for use, storage, and disposal; mixing and application rates; approved uses and inherent risks of use; limitations of remedies; and general information. Pages 2-22 through 2-26 of the DEIS describe BMPs and mitigation measures that are integral parts of the proposed project that would be followed to ensure the safe and proper use of herbicides on the W-CNF.

4.2 Appendix D of the DEIS presents noxious weed management guidance taken from Forest Service Manual 2080, Appendix III. This guidance includes a series of noxious weed prevention and control measures for domestic grazing activities (see Appendix D, pages III-6 and III-7) that are considered in the management of all grazing allotments on the W-CNF. Stopping grazing on National Forest lands, as you suggest, or modifying the livestock grazing program, including revisions of grazing permits, allotment management plans, and annual operating instructions, are beyond the scope of the Proposed Action and alternatives being analyzed in this EIS.

4.3 Pages 2-27 through 2-29 of the DEIS briefly summarize the potential effects of implementing the proposed project on biological resources, including vegetation, aquatic resources, wildlife resources, and ecosystem function and biodiversity. Neighboring pages of the DEIS summarize potential project effects on other resources (for example, soil and water). A detailed analysis of the potential effects on all resources from implementing the Proposed Action and alternatives is found in Chapter 4 of the DEIS. The analysis includes an examination of wildlife resources (DEIS pages 4-29 through 4-65), including birds, and assesses the likelihood of toxic effects of herbicides on representative species of wildlife and on ecosystem function and biodiversity. The analysis recognizes that BMPs and mitigation measures would be implemented as an integral part of the proposed project in order to protect the environment and individuals from the potentially harmful effects of herbicides if inadvertently misused or misapplied.

4.4 Your opposition to the use of biological agents is noted. Pages 2-12 and 2-13 of the DEIS describe measures that are followed to prevent the type of occurrence you reference. The U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) rigorously screens and tests new biological agents for impacts on agricultural plants and on threatened, endangered, and sensitive plant species. It then prepares environmental assessments on the possible impacts of releasing those agents. Before the prospective biological controls can be released, they are placed in quarantine under "eat or starve" conditions with a variety of plant species to determine if they are host-specific to the plants they are intended to control. For the proposed project, only APHIS-approved biological controls would be used on the W-CNF and would be released according to APHIS requirements or Forest Service policy, whichever is more restrictive.

4.5 Reference to 14 percent is the approximate average annual rate of weed spread in the natural environment (natural conditions). Rate of spread can be higher or lower depending on the species, as well as on regional and site-specific conditions.

supposed to keep out invasive beetles, but instead USDA caters to nursery businesses, which have been allowed to bring in products with no surveillance, no investigation. usda has been doing a lousy job of monitoring what comes into this country and has in fact been the cause of the invasive knapweed, purple loosestrife. all of these plants proliferated from being brought into this country by the nursery business. usda works for business and has no thought to the good of this country, and that has caused problems. i suggest we take budget money from usda to fight the problems they are causing for the u.s. taxpayer. 4.6

i think this plan should specify whether the grazed areas are the prime areas where invasive weeds are spreading. if so, the grazing should be stopped and we should file a suit against the cattlee barons. 4.7

the first priority of utah dept agriculture ánd usda should be to ban all invasive weeds and their accompanying insects that are causing havoc in our country. that should be the first priority. why are you looking for endless taxpayer dollars to wipe out what is here when the usda/ag profiteers are continually bringing in more problems without investigation as to their safety? 4.8

Logging should be stopped since it brings in invasive weeds. Stop the logging. 4.9

Mechanical pulling - well usda and its agribusiness contingent continually wants more and more illegal criminal aliens to come into the u.s to flout our laws and to work for wage busting low wages - maybe some of those workers can help mechanically pulling out the weeds that usda has caused. usda's budget should be tapped to pay for this since they are the ones clamoring for low wage busting illegal criminal immigrants to come into this country. this policy hurts every single american and in fact shows flouting of american laws, but then to agribusiness and usda - profits are everything. they care not how they hurt america. 4.10

b. sachau
15 elm st
florham park nj 07932

4.6 Please see the response to Comment 4.3 regarding the USDA APHIS role in screening and testing new biological agents for potential use in biological treatments. Your concerns regarding the relationship between the USDA and nursery businesses are beyond the scope of the Proposed Action and alternatives being analyzed in this EIS.

4.7 Pages 3-12 through 3-18 of the DEIS discuss potential vectors of weed spread. Weed occurrence on the W-CNF appears primarily associated with the presence of roads, trails, campgrounds, and other human use areas. Wildlife and livestock also can contribute to the spread of weeds. However, as noted in the response to Comment 4.2, stopping grazing on National Forest lands is beyond the scope of the Proposed Action and alternatives being analyzed in this EIS.

4.8 Appendix A of the DEIS contains the Integrated Weed Management (IWM) strategy for the W-CNF that is designed to prevent the introduction and spread of noxious weeds, and to control or contain noxious weeds where they have been introduced. Appendix D of the DEIS provides regional guidance from Forest Service Manual 2080 on noxious weed prevention and management on National Forest lands.

4.9 Appendix D of the DEIS presents noxious weed management guidance taken from Forest Service Manual 2080, Appendix III. This guidance includes minimizing the creation of sites for noxious weed establishment during timber harvest on the W-CNF by considering a series of forest management activities (see Appendix D, page III-7). Stopping logging on National Forest lands as you suggest is beyond the scope of the Proposed Action and alternatives being analyzed in this EIS.

4.10 Review and analysis of immigration policies is beyond the scope of the Proposed Action and alternatives being analyzed in this EIS.

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Appendix H

Public Involvement

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APPENDIX H

Public Involvement

The Notice of Availability for the Draft Environmental Impact Statement was published in the Federal Register on March 10, 2006. The public comment period of 45 days closed on April 24, 2006. Four letters were received and responded to in Appendix G.

This Final Environmental Impact Statement (FEIS) incorporates the Wasatch-Cache National Forest Noxious Weed Treatment Program Draft Environmental Impact Statement (DEIS) by reference. Appendix E, *Errata* addresses changes to the DEIS that, in addition to Appendices F, G, and H make up this FEIS. This FEIS incorporates by reference the entire Project Record (40 CFR 1502.21). The Project Record, including the Resource Specialist Reports, comprises the detailed data, methodologies, analyses, conclusions, maps, references, and technical documentation relied upon by the Resource Specialists to develop the DEIS and FEIS.