

05-Nox. Weeds

USDA 1995e

Exhibit #1843 12--1995

**ENVIRONMENTAL ASSESSMENT
for
CONTROL OF NOXIOUS WEEDS IN WILDERNESS
on the
UINTA NATIONAL FOREST**

December 1995

ENVIRONMENTAL ASSESSMENT
for
Control of Noxious Weeds in Wilderness
Uinta National Forest

Background

The term noxious weed is used to describe pernicious plants occurring unnaturally on National Forest lands. Noxious weeds compete directly with more desirable and native plants for nutrients, water, space, and light. Once established they can change a highly productive site into a non- or less productive one and reduce biological diversity. They have the potential to impact naturally functioning ecosystems and the natural integrity of wildernesses.

Presently, awareness of the noxious weed and undesirable plant problem is confined largely to the agricultural and ranching communities and associated interest groups. However, the nature and extent of the problem transcends land ownership and uses.

In 1994 an Environmental Assessment was written and a decision was made in July of that year which approved an integrated approach to weed control on all areas within the Uinta National Forest outside wilderness. While control in wilderness was considered in that EA, no decision was made regarding wilderness.

Purpose and Need

There is a need to control noxious weeds within wilderness. Some of these plants occur in wilderness areas on the Uinta and where they occur they reduce the resource values on National Forest System lands. In addition, infestations provide seed sources for spread to private lands or other portions of the Forest. If the spread of these weeds is not controlled, they will significantly impact natural plant communities and affect the natural integrity of wilderness. The purpose of this action is to contain the spread of and eliminate noxious weeds within wilderness.

Proposed Action

The proposed action is to treat about 10 acres of noxious weeds per year over the next five years within wilderness using an integrated pest management (IPM) approach. The primary means of control will be by hand control (pulling or grubbing). Only for those infestations of noxious weeds such as Canadian thistle, knapweed, dyers woad, Dalmation toad flax, blue spurge, and leafy spurge where hand control is ineffective, will backpack application of chemicals be used as a means of control. Biological control will also be utilized; however, by itself it cannot be depended upon to eliminate or fully control infestations.

Musk thistle found along the western boundary of the Lone Peak Wilderness and occurring along trails and near trailheads and camping areas in Mt. Nebo and Mt. Timponogos Wilderness areas will be controlled by hand pulling or by grubbing. Canadian thistle will be treated using hand spraying and other IPM control methods. This includes infestations in Lone Peak Wilderness near Granite Flat Campground, Silver Lake Flat Reservoir, and along North Mountain Trail and in Mt. Timpanogos near Timpanooke. An infestation of Dyers woad in Lone Peak Wilderness near Tibble Fork Reservoir will be treated using IPM methods including spraying.

mentioned as an objective as a part of the range management goal to achieve satisfactory ecological conditions on all Uinta National Forest rangelands.

Public comment was sought to determine the significant issues and concerns related to noxious weed control forest-wide. Public comments were requested by advertisement of a legal notice in the Provo Daily Herald on March 11, 1994 and by 153 letters sent to potentially interested public mailed on March 10, 1994. Only 3 letters and 2 telephone communications were received concerning the proposal. No comments received addressed control in wilderness specifically.

Two issues have been identified internally that are unique to wilderness. They are:

1. Control of weeds in wilderness and its effect on the wilderness experience.
2. Noxious weed presence in wilderness and the effect on natural integrity.

Other issues addressed in the 1994 Environmental Assessment for noxious weed control for areas outside wilderness are still considered pertinent to weed control in wilderness.

3. Noxious weed and poisonous plant impacts on downstream agricultural economics caused by spread from National Forest System lands (impacts to other lands).
4. Noxious weed and poisonous plant effects on native vegetation, livestock, wildlife (particularly winter range), and watershed conditions (effects on other resources).
5. Effectiveness of the various control methods and need for integrated control and control method research (effectiveness of various control methods).
6. Human health risks including the risks to both project workers and the general public.
7. Possible impacts to Threatened, Endangered and Sensitive (TES) species.
8. Recent increases in acreage and number of undesirable weed species.
9. Potential impacts on water quality including protection of public drinking water supplies.
10. Effects of herbicide use on desirable vegetation.
11. Handling and storage of hazardous materials.

Alternatives

Forest Service policy for the control of noxious and other weeds is to utilize some form of IPM for achieving weed control objectives. Therefore, only alternatives that meet this policy are considered for controlling noxious, invading and undesirable weeds on the Uinta National Forest. Four alternatives are considered in detail. They are: (1) No Weed Control Program, (2) No Action - Continue Current Program, (3) Integrated Pest Management, and (4) Integrated Pest Management Without Herbicides.

6. All workers will be required to wear protective clothing when applying herbicides.
7. Application will cease when wind speeds reach 6 miles per hour.
8. Water will be used as a carrier or diluent for herbicide application.
9. Before any herbicidal weed control efforts are undertaken, qualified personnel will delineate areas where those threatened, endangered and sensitive species are found or are likely to be found. No herbicides will be used in areas where an impact is likely to occur on federally designated threatened or endangered or Forest Service sensitive species.
10. In cases where control must be undertaken in known or suspected threatened or endangered or sensitive species habitat, qualified personnel will conduct a site-specific assessment of the presence and distribution of the species and recommend the use of a control technique that would not adversely affect the species.
11. In no instance will a noxious weed control be undertaken where there is a reasonable likelihood of a threatened, endangered, or sensitive species being adversely affected. Impacts are not anticipated on threatened, endangered or sensitive species under any of the alternatives listed for consideration.

- III = Manual
- IV = Mechanical
- V = Prescribed fire
- VI = No Treatment

Description of Affected Environment

The Uinta National Forest lies within the Southern Rockies and Great Basin physiographic areas. A complete description of the area and resources covered by this EA is included in Chapter 3 of the FEIS for the Uinta National Forest Land and Resource Management Plan.

Minor invasions of musk thistle (*Candus nutans*) have been recently located adjacent to the National Forest boundary in the western portion of the Lone Peak Wilderness. No populations of musk thistle have been confirmed in Mt. Nebo or Timpanogos, but there are known infestations on nearby lands and some infestations, now or in the future, are likely within these wildernesses. Canadian thistle (*Cirsium arvense*) has been found in two locations in the Lone Peak Wilderness; one on the east edge near Granite Flat Campground water system and the other along North Mountain Trail in the Dry Creek drainage. Canadian thistle is also known to be present outside Lone Peak Wilderness near Silver Lake Flat Reservoir and adjacent to Mt. Timpanogas Wilderness in the Timpanooke area. Dyers woad (*Isatis tinctoria*) is present on the north side of Tibble Fork Reservoir near Lone Peak Wilderness. Dalmation toad flax (*Linaria dalmatica*) has not been confirmed within any of the wilderness areas; however, it is found near Lone Peak and Mt. Timpanogos and very likely has or soon will spread into suitable habitat in these wildernesses. Blue spurge (*Euphorbia myrsinites*) is often planted on rocky foothill sites in residential areas and is of concern adjacent to the wilderness boundary near Alpine.

Other species of concern within wilderness are spotted knapweed (*Centaurea maculosa*), leafy spurge (*Euphorbia esula*), jointed goatgrass (*Aegilops cylindrica*), whitetop (*Candaria draba*), Scotch thistle (*Onopordum acanthium*), yellow starthistle (*Centaurea solstitialis*), and perennial poison hemlock (*Conium maculatum*).

Wildernesses

Mt. Timpanogos - This 10,750 acre wilderness was added to the system with the enactment of 1984 Utah Wilderness Act. It is located just east of American Fork and Pleasant Grove. The area contains numerous high mountain meadows, terminal and lateral glacial moraines, large cirques with glacial lakes and year-long snow fields. It is a popular day use area for residents of the Wasatch Front; experiencing an estimated 55,000 recreation visitor days of use in 1994. There is no big game winter range nor active grazing allotments within this wilderness. Areas likely to have or experience weed infestations are those disturbed by trail construction and other uses prior to wilderness designation.

Mt. Nebo - This area was also designated wilderness in the 1984 Utah Wilderness Act. It is located in Utah and Juab Counties 3 miles northeast of Nephi, Utah. This 28,170 acres area has very steep terrain rising from the valley floor to the top of Mount Nebo, the tallest peak of the Wasatch Front (11,887 feet elevation). The south, east and west sides of the wilderness area provide big game winter range. Cattle graze along the benches on the west side and sheep forage in upper Salt Creek on the east side of the wilderness. Recreation use in the wilderness is very light in steeper, more inaccessible areas and heavier along the trails and near access points. In 1994, Mt. Nebo experienced an estimated 23,500 recreation visitor days of use. Mona City receives its water from Clover Creek and its diversion and transmission facilities are located in the Mt. Nebo Wilderness. Santaquin City and Nephi City both

Environmental Consequences

This section describes the environmental effects of the 4 alternatives to be evaluated in detail.

The purposes of implementing an IPM Program for control of undesirable weeds is that such a program can provide more effective, economic, and environmentally safe accomplishment of program objectives. Most of the concerns about implementation of such a program relate to the use of herbicides as a part of the program, or with the effects of failure to implement an adequate program to effectively control the undesirable plant species. Little concern was expressed about the proposal to control the targeted species or to utilize manual, mechanical, or biological means of control. Therefore, this analysis of impacts will deal largely with the proposal to use herbicides to achieve the desired results.

All of the herbicides proposed for use under this assessment have been approved by the U.S. Environmental Protection Agency. It is only lawful to use these chemicals in strict conformance with the label instructions listed on each individual product. It is the intention of the Uinta National Forest that strict conformance with such instructions, as well as adherence to other specific mitigating measures, developed as additional precautionary requirements will take place as individual project components are implemented.

The effects of the various alternatives can be adequately summarized with current knowledge. The recently developed "Risk Assessment for Herbicide Use In Forest Service Regions 1, 2, 3, 4, and 10, and On Bonneville Power Administration Sites" assesses the risks of utilizing the herbicides proposed for use and information from this document is incorporated by reference into this EA.

Additionally, although not raised as issues, the following items are documented with regard to their relationship to the 2 alternatives that include the use of herbicides. The situation will not be significantly different between either of those 2 alternatives.

1. Significant impacts on air quality are not anticipated. A residual odor from spray application will be present on a short-term basis.
2. Impacts to soil will be minor and short-lived because of the small magnitude of chemical use and the minor soil-disturbance nature of treatments.
3. Impacts on fish will be short-lived and slight because location, design, and geographic distribution of treatment sites.
4. Recreation and visual impacts will be short-lived. The major impact will be in the color contrast between treated and untreated vegetation. Design criteria will minimize exposure of Forest visitors to residual herbicides.

A comparative summary of the estimated effects of the various alternatives as they relate to the issues are listed in the following table:

3. *Impacts to other lands*

If the weed control program in wilderness is discontinued there would be an opportunity for target weeds to spread to adjacent private and other lands from Lone Peak, Mt. Nebo, and Timpanogos Wildernesses. Also, weed infestations would increase within wilderness. This could result in dissatisfaction on the part of adjacent landowners.

4. *Effects on other Resources*

With no weed control program, the existing and likely expanding population of target weeds would negatively impact various Forest resources. Less competitive species of desirable vegetation would be crowded out on some sites at an increasing rate. This would reduce the amount of forage available for livestock in Mt. Nebo and wildlife in all wildernesses. This is of particular concern on big game winter ranges in Lone Peak and Mt. Nebo where there is already a scarcity of desirable forage and where there are a number of undesirable weeds that compete with more desirable species. In addition, some of the noxious weeds are poisonous to recreational livestock (e.g. yellow starthistle is poisonous to horses, water and poison hemlock are poisonous to all mammals).

5. *Effectiveness of various control methods*

Under this alternative, no treatment would be implemented and no control achieved. Existing infestations would persist and likely spread new; new infestations would likely develop.

6. *Human health risks*

There would be no direct human health risks. There is potential for indirect human health risk through potential human contact with poisonous plants such as water and poison hemlock. These species are not known to presently occur within any of the wildernesses; however, the threat for invasion exists and under this alternative there would be no opportunity for treating potential invaders.

7. *Impacts to TES Species*

With no control program there would be no opportunity for possible damage to TES species by any treatment method. It is unlikely that lack of a treatment program would jeopardize any of the TES species of concern to the Uinta National Forest.

8. *Recent increases in the acreage and number of undesirable weed species*

Without a weed control program there would be no opportunity to influence the number of acres and new starts of invading species within wilderness. Natural processes would determine the composition of plants. Existing infestations would persist and likely spread new; new infestations would likely develop.

9. *Potential impacts on water quality*

If the weed control program is discontinued it will have no direct impact on water quality. Indirect impacts have and increasingly occur as noxious plants overtake native desirable vegetation resulting in decreasing ground cover. This could cause some increased erosion,

and its hand treatments more expensive than the herbicide applications in the other 2 action alternatives.

3. *Impacts to other lands*

The current program within wilderness is very limited and has little effect on resource production and values of other lands. Both alternatives 3 and 4 increase control in wilderness to 10 acres a year which will reduce the likelihood of spread to other lands. Alternative 3 will be more effective in this since more species will be effectively controlled. This will help protect the productivity and value of the other lands. This includes agricultural businesses, recreation, road rights-of-way, real estate values, and wildlife habitat. No other resource impacts to other lands are expected. Public concerns about the need to improve and expand the program will remain at about the same level or will increase slightly. When considered cumulatively with control outside wilderness, the impacts to other lands become more noticeable.

4. *Effects on other Resources*

Terrestrial vegetation will be the most affected environmental component. Design criteria will keep the amount of non-target plant damage to a small level. The only non-selective herbicide used on the Forest will be glyphosate. It will be used on a limited basis for control of jointed goatgrass. None of the other herbicides being considered affect grasses.

Livestock impacts will be minor or non-existent. No known infestations occur in areas currently grazed; however, unknown populations of musk thistle, Dalmation toad flax or other noxious weeds may exist or these may invade in the future. In addition, design criteria and label directions will require some additional management; however, herbicide rates are so low that there should be no significant effect on animals. Improvement of range condition and forage production can be expected in most treatment areas as a result of reduced competition with target weeds and from reseeding of some areas which are heavily infested.

Wildlife habitat will be improved through replacement of weeds on critical winter range on the west edge of Lone Peak. If future inventories discover noxious weeds on the Mt. Nebo winter range, treatments will result in similar effects. Under the existing program, no wildlife species are likely to receive toxic or fatal doses of herbicides. Selected herbicides show low or no tendency to bio-accumulate. Table III-H-2 in the 1992 Risk Assessment indicates that the risk to all species of animals listed is low from the chemicals proposed for use. The risks involved are actually lower than those listed because the predicted risks are based on aerial application of herbicides and no aerial application is proposed.

Impacts to water resources will be minor and short-lived because of the small size and geographic distribution of treatment areas and the precautions taken in completing the work.

5. *Effectiveness of various control methods*

The existing program in wilderness has been very limited. Alternative 2 allows opportunity for some control successes. However, there are some weeds that need more attention and new and better herbicides are now available for use (as proposed in Alternative 3). A more aggressive program would be more effective and safer to some degree. Alternative 4 would offer limited opportunity for success; especially for species like Canadian thistle, knapweed, Dalmation toad flax, dyers woad, blue spurge and leafy spurge that are hard to control without herbicides.

7. *Impacts to TES Species*

Three threatened and endangered species are known to exist within or near the Uinta National Forest in areas where control of noxious weeds is likely to take place. The Bald Eagle is a winter resident on the Forest and may occasionally fly over or make hunting forays over the Mt. Nebo Wilderness. The eagles would seldom land in these areas and would not be present during the spring and summer when control activities take place. Disturbance will not occur as a result of such control activities. None of the control activities are expected to adversely affect the Bald Eagle's habitat or present any hazard for this species.

The Clay Phacelia is not known to inhabit the Uinta National Forest and unlikely to occur within any of the wilderness areas. This species would not be affected by implementation of any of the alternatives.

Similarly, Utes ladies tresses is not known to or judged likely to occur within any of the wilderness areas. The species would not be affected by implementation of any of the alternatives.

The following measures are considered adequate to assure that control activities do not further threaten the existence of these plants and other sensitive species discussed hereafter.

Five species of sensitive plants listed by the Intermountain Region exist within or adjacent to the Uinta National Forest. They are King wood aster, Dainty moonwort, Rockcress, Wasatch jamesia, Garrett bladderpod. Eight Region 4 (USFS, R-4) sensitive animal species have been listed as occurring in various habitats of the Uinta National Forest. They include the Spotted bat, the spotted frog, the Northern goshawk, the Western Big-Eared bat, the Flammulated owl, the three-toed woodpecker, and the Colorado and Bonneville cutthroat trout. Mitigation included in all action alternatives will adequately protect these species from impacts.

8. *Recent increases in acreage and number of species of undesirable weeds*

The acreage of undesirable weeds in wilderness has increased since the original EA was approved in 1988. Control in wilderness has been limited because of restrictive wilderness policy and high cost treatment methods. The opportunity for such action to be successful would be much greater under Alternative 2 than under Alternatives 1 or 4, but the opportunity for success would be better if Alternative 3 is initiated.

9. *Potential impacts on water quality*

Several culinary water supplies come from wilderness watersheds. This includes Granite Flat Campground's water source which is near a known infestation of musk thistle. The distances required to protect the human health risk to water sources from drift from spraying activities associated with backpack should be sufficient to protect surface waters from unacceptable pollution levels. As described in Table III-D-2 in the 1992 Risk Assessment, this buffer will be a minimum of 20' when herbicides are applied using backpack sprayer. In addition, whenever herbicide use is proposed for weed control in the vicinity of any public drinking water supplies, city or other responsible officials will be contacted to evaluate the proposed treatments. Any of the alternatives should adequately protect water quality, however Alternative 3 should be slightly more effective than Alternative 2.

- B. An attempt will be made to develop an ethic within the Forest employees and the public similar to that exemplified by "can collection" to take action on noxious weed control along roads in small isolated areas; i.e., if just a few weeds are encountered in an area, get rid of them while you are there.
- C. An inventory update will take place each year to provide current information on weed infestations.
- D. Biological agents will be introduced as feasible. The success of introducing the Canadian thistle stem mining weevil will be evaluated. Musk thistle head weevil introductions may be continued as a control agent for Musk thistle. Because Musk thistle has continued to spread despite the introduction of weevils in the early 1980's, biological control will be supplemented with the use of herbicides.
- E. Completed surveys will be reviewed for threatened and endangered species prior to treatment. Where areas have no documented survey, one will be initiated. If a threatened and endangered species is present, a biological assessment will be made to identify how the species will be affected. If an impact is likely, no herbicides will be used. Clay Phacelia and Ute ladies tresses have been identified on or near the Uinta National Forest. Before applying herbicides in areas where these species or Forest Sensitive plants may exist, the steps listed under the "Issues and Concerns, Threatened, Endangered, and Sensitive Species" Section and in the biological evaluation and assessment will be completed.
- F. A review of the literature and interviews with weed scientists show that a major cause of noxious weed invasion and establishment is human-caused soil disturbance. Also, many of the weeds of concern are sensitive to shading and competition from other plants. The results of field reviews and analysis of noxious weeds on National Forest System lands in Montana found a direct correlation between soil disturbance and noxious weed invasion (Losensky, 1987). This finding is reinforced by field observation on the Uinta National Forest. Most of the noxious weed problems occur along roadside zones, recently disturbed construction areas, areas of heavy grazing disturbance, barren areas, or areas of less than satisfactory ground cover where the seedlings of these invaders can gain a foothold and compete with existing vegetation.

All Forest management programs should consider the need to provide immediate restoration of plant cover consisting of desired plant species a high priority. Proper management of the Forest's grazing program provides the greatest potential to achieve control and containment of noxious weeds. Grazing prescriptions in revised Allotment Management Plans will give consideration to these needs. Vigorous enforcement of the Forest Travel Management Plan will also reduce the amount of unnecessary land disturbance and thus, the opportunity for spread of noxious weed into wildernesses and other areas. Revegetation programs will utilize seed tested to be free of noxious weed seeds.

- G. Cooperative agreements between the Forest Service and the Counties and other landowners will be reviewed annually and updated as needed with annual work plans to facilitate control of weeds on lands with mixed ownership.
- H. The following are required for monitoring:
 1. Each year, a Forest Service hydrologist will review the proposed pesticide program and recommend what water monitoring should occur, and the Forest Water Quality Monitoring effort will be revised in accordance with these recommendations.

12. Spray tanks will not be washed out in or near streams and chemical containers will not be disposed of on the treatment area. Chemical containers will be disposed of according to label directions and State Department of Environmental Quality regulations.
13. Herbicides will be mixed and loaded in an area where an accidental spill cannot flow into a stream or water body. Any herbicide use adjacent to streams will be carefully controlled to avoid introduction of herbicides to water bodies.
14. Herbicide containers will be rinsed 3 times and the rinse water dumped into the mixing tank. The empty containers will be taken to a landfill for disposal. Each empty container will be punched with a hole in the bottom.
15. Application will be timed to coincide with early bolting and formation of flower structures. Of necessity, the Uinta National Forest's program will also include spraying early in the spring when plants are in the rosette stage and in the fall when new seedlings have sprouted.
16. Applications will be well-controlled to prevent treatment of nontarget plants.
17. Applications will be halted if wind speeds reach 6 mph at eye level.
18. Pump pressure will not exceed 30 psi, and nozzles will be adjusted for course spray to avoid drift.
19. No spraying will be done when temperatures exceed 80°F to avoid volatilization of herbicides into the air.
20. Spraying will not be done if significant precipitation is expected within 2 hours of treatment.
21. Unless label requirements or other mitigation needs are more strict minimum spray distances from live water application will be 20' with backpack sprayers. No spraying with backpacks should be done within 50 feet of unprotected humans or animals.
23. If herbicide treatment is proposed in the vicinity of municipal or other public drinking water supplies, officials responsible for those supplies will be contacted to provide input regarding the need to protect those water sources.
24. In line with concerns for reproductive health in Table III-E-4 of the Risk Assessment, female workers will not be allowed to apply more than the maximum exposure amounts of 2,4-D, dicamba, or diesel oil per day listed in Table III-E-21 of the Risk Assessment.
25. For other health reasons, no workers will be allowed to apply more than the maximum exposure amounts of 2,4-D, hexazinone, or diesel oil per day listed in Table III-E-21 of the Risk Assessment.

Cumulative Effects

The cumulative effects of this proposal are expected to be insignificant even though the program is long term.

List of Agencies, Organizations, and Persons to Whom Requests for Comments Were Sent

Utah Wilderness Association
Granite School District
Henry Jolley
Bureau of Land Management
Salt Lake District
Mayor, Payson City
American Fork Irrigation Company
Tooele Wildlife Federation
Forest Supervisor
Ashley National Forest
Utah Division of Water Resources
Vernon Irrigation Company
Eco-Response Club,
Brigham Young University
Audubon Society, Utah County Chapter
Lillian Hayes
Gardner Canyon Irrigation Company
Utah County Weed Control
Forest Supervisor
Manti-La Sal National Forest
Utah Farm Bureau Federation
Tom Bingham
Mayor, Mapleton City
Jordan Tanner
Provo City Water Resources Department
Utah County Health Department
Juab Cattle Association
Forest Supervisor
Wasatch-Cache National Forest
Vance Aagard & Son, Inc.
Howard C. Sumsion
W.S. Brimhall
Utah Wildlife Federation
Gerald E. Gordon

Sundance
Utah Department of Transportation
District 6
Mayor, Santaquin City
Utah State Clearinghouse
Utah Wild Turkey Federation
Utah Woolgrower's Association
Aspen Grove Recreation Area
American Fork Irrigation Company
Congressman Bill Orton
Jess R. Bushman
Rock Canyon Preservation Alliance
Sanpete County Commissioners
Timpanogos Archery Association
Dallas Smith
Stonefly Society
Sierra Club,
Mark Clemens
Sierra Club,
Christine Osbourne
Strawberry Water Users Association
Gary Aitken
U.S. Fish and Wildlife Service
W.R. Liechty
Merrill Beckstrom
Utah County Commissioners
Granite School District
Claudia Thorum
Pleasant Grove Sportsman Club
Congressman James V. Hansen
Senator Orrin Hatch
Juab County
Board of County Commissioners

APPENDIX A

This appendix contains comments on the Predecisional EA and responses to those comments. Two comments on the Predecisional EA were received during the 30-day review period (Comments # 1 and 2 in this appendix). Letter #3 was received in response to a request to the U.S. Fish and Wildlife Service (USFWS) to review the Forest Service's determination that there will be no adverse impacts on threatened and endangered species. The response to this request was received after closure of the comment period and normally would not be included in this appendix. However, because this pertains to a subject of wide interest to the public and pertinent to issues identified in the EA, the letter documenting USFWS findings has been included for informational purposes.

1-1. We appreciate your interest. Very few impacts to insects are anticipated for the following reasons:

- * Limited use of herbicides rather than pesticides is proposed. Herbicides have limited direct effects on insect populations.
- * Alternatives 2 and 3 (the proposed action) call for treatment of a very limited acreage of noxious weeds with chemicals. This is unlikely to have any significant direct or indirect (e.g. habitat) impact on insect populations.
- * The proposed treatments would be very selective. Specific weed plants would be targeted for treatment and treated appropriately (e.g. hand grubbing or backpack sprayer) rather than broad area-wide type treatments (e.g. road side spraying done by counties).

CONTACT FORM

Date: June 12

Title of Document: Wilderness Deed EA

Name of Project Coordinator: Reese Pope

Name: Mark Clemens - Sierra Club

Address: _____

Phone: 373-4739

Comments: Mark wishes to make formal comments through this phone conversation - will not follow up in writing. After reviewing this document his only concern lies in potential impacts to insects ~~that~~ and he hopes that treatment timing will take into affect insect species (non-target) and avoid critical periods. This is his only concern; he recognizes the need to treat exotic invaders, and is very interested and wishes to remain informed.

Attachments: Yes No
How many? _____

Location: _____

Name and signature of Person Taking
Comments: Deanne R. Nelson

Signature of Person Commenting: phone conversation

1-1



Utah Wilderness Association

455 East 400 South #205 / Salt Lake City, Utah 84111 / (801)359-1337

July
June 5, 1995

Peter Karp
Forest Supervisor
Uinta and Wasatch-Cache National Forest
88 West 100 North
Provo, Utah 84601

Dear Peter:

We are in receipt of the predecisional EA for Control of Noxious Weeds in Wilderness on the Uinta National Forest. While our files and collective memory show no indication that we ever received this document, we are appreciative of Loyal Clark's concern that the forest had not received a comment form us and her subsequent phone call to make sure we had received the EA. We also appreciate promptly receiving the EA from Reese. Due to this glitch we are under a rather short time frame and therefore must keep our comments brief.

First, the proposal is clearly stated--kill noxious weeds in designated wilderness. Few people would oppose that idea. What is missing is typical in many Forest Service proposals--what is the goal or desired future condition? The EA notes the "proposed action is to treat 10 acres of noxious weeds per year..." For how many years...or how many acres? This is a fundamentally important and reflective question as it relates to whether the proposed action is, indeed, controlling noxious weeds. In what year or at what acreage are noxious weeds "controlled"? Recognizing this may never actually occur makes this question even more important. In other words monitoring is a crucial component of this proposed action but one which seems to have been glossed over.

Second, the crucial issue of why noxious weeds are so prevalent and increasing is not addressed and an equally fundamental problem. No management actions are noted which will be initiated, except, we presume, the certified hay order and the proposed IPM actions, to prevent the increase of noxious weeds. Research has shown when the activities that impact environments which make room for noxious weeds are ended then the invasion of most noxious weeds is also severely curtailed. By now it is abundantly clear that for the most part, the use of herbicides to control noxious weeds is considered ineffective and at best a short term response. "In other words monitoring is a crucial component of this proposed action but one which seems to have been glossed over."

Third, the question of external boundaries and activities is very important. Noxious weeds exist in great abundance on the areas outside of these wildernesses on both Forest Service and private lands. One can't look at this issue except in a broad ecosystem view. Looking only at the wildernesses or even the forest will never impact the problem. But it does lend great credence to the point above--the forest must minimize, by actions other than the partially corrective short term use of herbicides, the activities that create habitats conducive to noxious weeds rather than the native flora. This is a far more productive and long term effort.

Fourth, there is no meaningful quantifiable analysis which would indicate the reduction of acres covered by noxious weeds due to the proposed action will have any impact on the integrity of the wilderness landscape. "In other words monitoring is a

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Thank you for your comment.

General direction pertaining to desired future conditions in wilderness is contained in the Wilderness Act of 1964. In addition, a general desired future condition for Lone Peak, Mt. Timpanogos and Mt. Nebo Wilderness areas is presented on page 3-165 of the 1984 Uinta Land and Resource Management Plan (as amended and corrected).

"Management of the Wilderness Management Area will be directed toward maintaining a wilderness identity and critical watersheds. Recreation opportunities will remain available only as long as the integrity of scenic beauty, watershed quality, wildlife habitat, and other wilderness resource values are protected..."

No more than 10 acres per year would be treated in Alternatives 2-4. Under the No Action alternative (#1), no acres would be treated. Our experience has shown that it often takes a minimum of 3 to 5 years before treatment effectiveness can be determined. Given this, Alternatives 2-4 would be implemented over a 5 year period. During the implementation period (the next 5 years), treatment effectiveness will be monitored (see Mitigation Measures, especially item C and H, pg. 17-18). This will happen automatically as part of all biological, mechanical and chemical treatments considered since all treatments proposed in this EA are targeted to individual weed plants rather than treatments of broad areas. After the 5-year implementation period, or in the unlikely event of a significant expansion in noxious weed infestations, a new analysis will be initiated. As part of this analysis, an updated assessment of noxious weed infestations will be required. This analysis will be done in accordance with the law including compliance with the National Environmental Policy Act.

We concur the presence of noxious weeds is a concern and that disturbances can create environments favorable to the establishment of noxious weeds (see Mitigation Measure F, pg 17). We must note that though many of these disturbances have been originated by man, some are from natural causes (e.g. lightning ignited wildfires, avalanches, landslides, etc.). What is not "natural" is that there are now weed species present which can and have invaded some disturbed sites. We also agree that use of herbicides is in general, a short term response. Ideally, this response will eliminate the invading weed species thereby allowing the native plant community the opportunity to reestablish an environment less susceptible to future invasion. More realistically, we expect to eliminate some infestations, reduce others, and at least keep infestations of noxious weeds from expanding (see issue #8 in the EA). Implementation will be monitored as described in Response 2-3.

The scope of this EA is limited to treatment of existing infestations of noxious weeds within the 3 wilderness areas on the Uinta National Forest. We concur that formulation of a strategy for eliminating noxious weeds altogether, requires consideration of actions which might provide opportunities for establishment of additional weed infestations. As you note, the certified hay order (and correspondi

direction in the Uinta Forest Plan) is one such consideration. Some others are identified in the Mitigation Measures listed in the EA (e.g. Items A, B, & F). The impacts of proposed activities on the establishment of noxious weeds is also considered as part of all project proposals where this is foreseen as likely and identified as an issue. Consideration of possible impacts of various projects and activities on noxious weeds is outside the scope of this EA.

2-5

We concur that to eliminate noxious weeds, a broad ecosystem view must be taken. However, the Forest Service has no authority to initiate actions to prevent or control noxious weed infestations off of National Forest System lands. Treatments on these lands are initiated by private landowners and also the counties. Treatments on intermingled private/national forest system lands will be coordinated with the counties and landowners (see Mitigation Measure G, pg. 18). On the Uinta National Forest, this EA coupled with the 1994 EA for treatment of noxious weeds outside of wilderness addresses treatment on all of the Uinta National Forest. As part of both of these EA's, one issue considered (Issue #3) was the effects of treatment on lands outside of the Forest and the effectiveness of treatment on NFS lands (see Issue #3).

The impacts of proposed activities on the establishment of noxious weeds is also considered as part of all project proposals where this is foreseen as likely and identified as an issue. However, consideration of possible impacts of various projects and activities on noxious weeds is outside the scope of this EA.

2-6 In the EA, the impacts of treatment are described in qualitative rather than quantitative terms. Given the often widely scattered occurrence of individual or small groups of noxious weed plants, it is impracticable to quantitatively analyze these effects. Monitoring is addressed in Responses 2-3 thru 2-5.

2-7 Alternative 4 provides only for biological/physical controls. The scope of this EA is limited to treatment of existing noxious weed infestations (see Response 2-4).

2-8 The effects shown in the EA. Summarizing these, the total acreage to be treated with herbicides is expected to be very small (total area herbicides and biological/physical methods < 10 acres), the herbicides selected; especially given the limited acreage and focused application on individual plants in accordance with the mitigation measures listed in the EA; are not anticipated to have any long-term or synergistic effects that would occur when viewed cumulatively.

2-9 We concur that the program may be constrained by funding. However, use of Forest Service employees/contractors and funds to entirely complete this work is but one option available for securing the treatments proposed. In some areas, the Forest Service has been successful in working with volunteers and partners to get noxious weed treatments accomplished. The intent to pursue this is also noted in Mitigation Measures A and B, pg. 17 in the EA. If these efforts are not successful and if adequate funding is not available then fewer or no acres will be treated. The effects of treating fewer acres, or only through mechanical/biological means (which is probably what could be accomplished through volunteers/partners) are described for Alternatives 1 and 4 respectively. A benefit/cost analysis was not conducted since many of the benefits are qualitative and extremely difficult to value (a commonly accepted quantitative value) in our experience. Monitoring addressed in Responses 2-3 thru 2-5.

2-10 Thank you for your suggestion. We concur that the potential risk of providing opportunities for additional invasions of noxious weeds be considered in any potential ground disturbing activity (see Response 2-5). We also concur that noxious weed considerations must transcend property boundaries (see Response above and Mitigation Measure G, pg. 18).

2-6

2-7

2-8

2-9

2-10

crucial component of this proposed action but one which seems to have been glossed over."

Fifth, an analysis should be completed showing biological/physical controls along with the reduction of impacts creating the perturbations necessary for the invasion of the noxious weeds combined with coordinated control outside of the forest. This is not only a common sense alternative, but one clearly required by NEPA.

Sixth, the risk (cumulative) analysis of annual programs and the loss of productivity to the wilderness ecosystems as a whole due to constant herbicide application, however small, must be evaluated. As you know this is of paramount concern even with moderate use of herbicides. The research again shows herbicidal applications do have both long and short term impacts on ecosystem productivity which plays throughout the system.

Seventh, this program may be constrained by funding. The EA should show what will happen if funding is not adequate and show a benefit/cost analysis in the context of the external boundaries as well. This would be particularly insightful in the context of minimizing the activities that have increased the invasion of noxious weeds. If this not addressed the U. S. Forest Service will simply continue wasting money and add to the loading of our global environment with herbicides. "In other words monitoring is a crucial component of this proposed action but one which seems to have been glossed over."

The point is these wildernesses require great sensitivity. Because it appears the acreages of noxious weeds are minimal, absolutely no herbicidal use should be allowed (the rule is a minimum test rule and herbicides simply don't meet that test). IN THIS INSTANCE IT IS CRUCIAL, IMPERATIVE, IN FACT, THAT THE ACTIVITIES THAT ARE CREATING THE POTENTIAL FOR INVASION OF NOXIOUS WEEDS BE ENDED WITHIN THE WILDERNESS. THAT IS THE CLEAR DIRECTION WITHIN FOREST SERVICE WILDERNESS MANAGEMENT PRINCIPLES. IT IS EQUALLY OBVIOUS THAT WILDERNESS BOUNDARIES ARE LITERALLY ARBITRARY BORDERS WHEN VIEWED IN THE CONTEXT OF A BROAD ECOSYSTEM. IF NOXIOUS WEEDS ARE GOING TO BE KEPT OUT OF THE WILDERNESS THEN THE INTEGRATED PEST MANAGEMENT, THE CONCEPT OF THIS EA, MUST FOCUS NOT ON HERBICIDES BUT ON MANAGING THE NATIONAL FOREST LANDS, WILDERNESS AND NON-WILDERNESS SO THAT NOXIOUS WEEDS DO NOT HAVE THE PERTURBED ENVIRONMENTS TO TAKE HOLD IN!

To suggest the forest is using an IPM process without a preventive action scenario in place and without a strong monitoring program is not accurate.

We look forward to hearing from you and seeing these issues addressed.

Thanks very much, Peter.

Best

Dick Carter
Dick Carter
Coordinator



United States Department of the Interior
FISH AND WILDLIFE SERVICE
UTAH FIELD OFFICE
LINCOLN PLAZA
145 EAST 1300 SOUTH, SUITE 404
SALT LAKE CITY, UTAH 84115

In Reply Refer To
(ES)

September 11, 1995

Peter W. Karp
U.S. Forest Service
P.O. Box 1428
Provo, Utah 84603

Dear Mr. Karp:

The U.S. Fish and Wildlife Service has received your letter of July 5, 1995 with its accompanying biological assessment of the proposed control of noxious weeds on the Uinta National Forest, Utah. The Service FWS has reviewed the biological assessment and concurs with your determination that the proposed noxious weed control program will not adversely affect any species currently listed as endangered or threatened or to adversely impact any candidate species currently under review by the FWS. If we can be of any further assistance please contact us.

Sincerely,

Robert D. Williams
Assistant Field Supervisor

UINTA NATIONAL FOREST

SEP 13 1995

R2E

NORTH



T3S

T4S

R3E

R4E

T4S

T5S

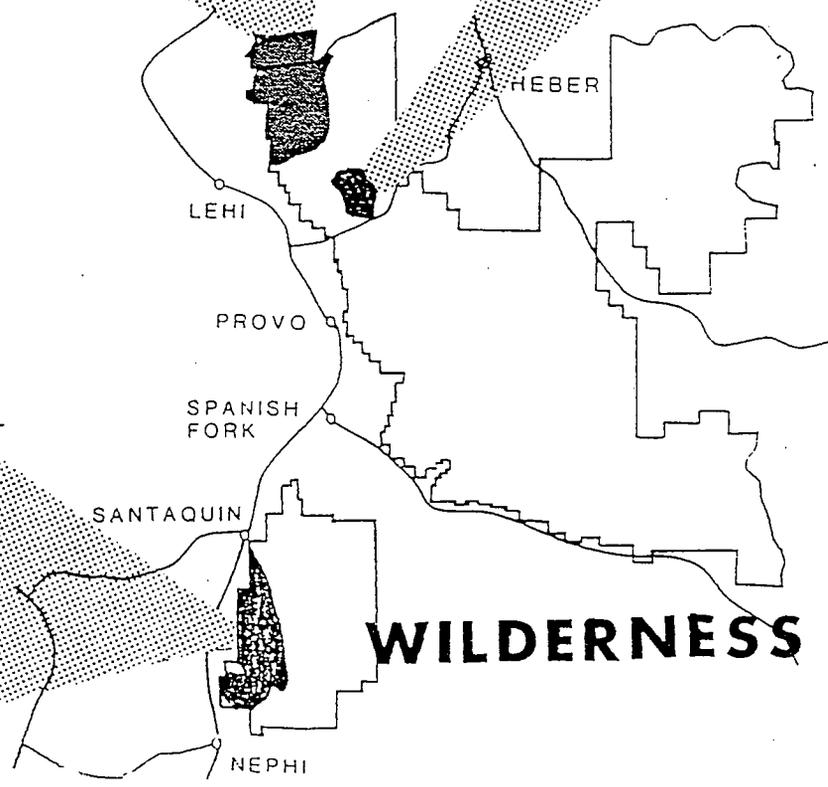
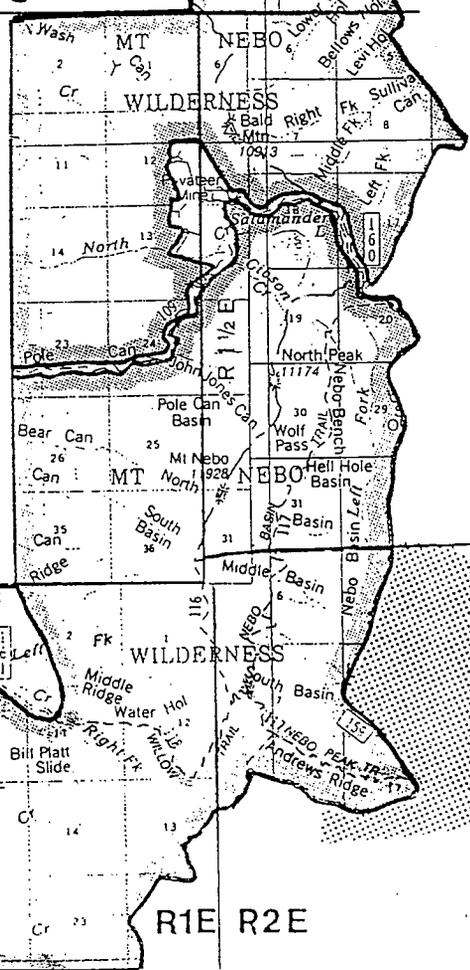
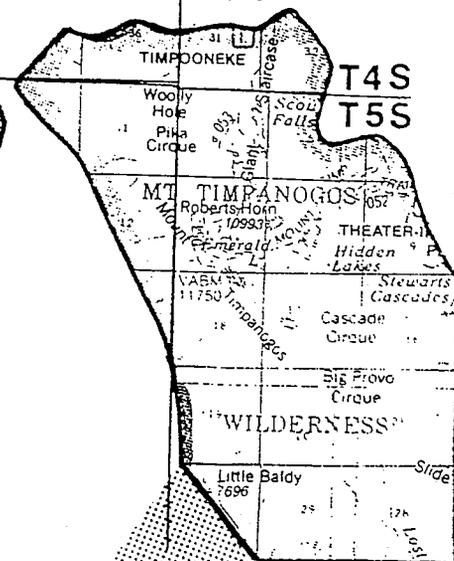
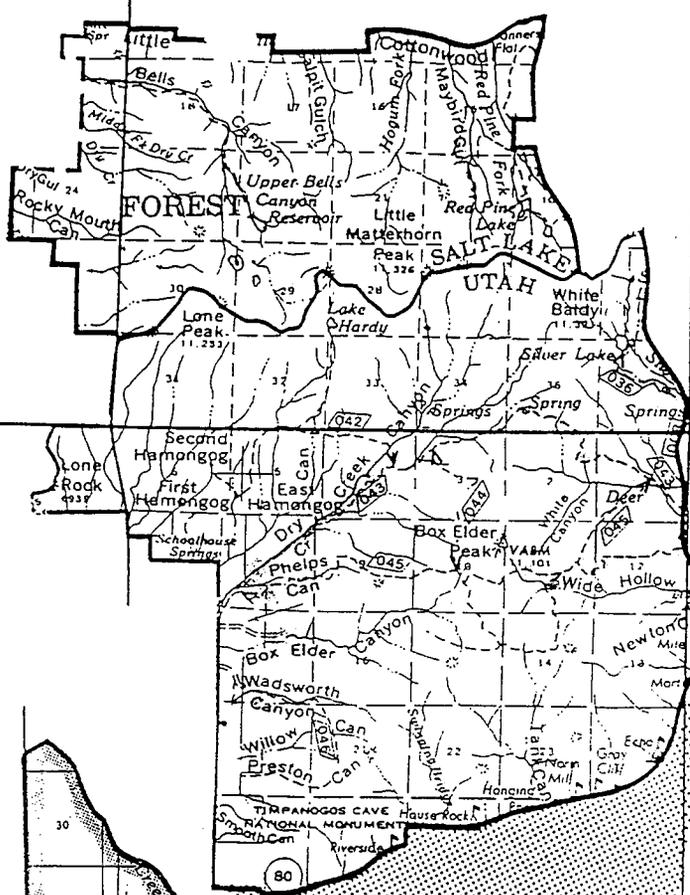
T10S

T11S

T12S

R1E

R2E



WILDERNESS

 General weed infestation/ invasion locations