Chapter 5 – Response to Comments

5.1 Introduction

This chapter 1) provides entire copies of the federal and state agency letters received; 2) explains how public comments were processed and evaluated; 3) lists the names of individuals, agencies, and organizations that commented on the Draft EIS; and 4) shows the individual comments received and our responses to them.

5.2 Copies of Federal and State Agency Letters Received

The following are copies of letters received that provide comments to the Wallowa-Whitman National Forest Invasive Plants Treatment Project Draft Environmental Impact Statement from the Environmental Protection Agency, The United States Department of Interior (USDI), USDI Vale Bureau of Land Management, Oregon Department of Agriculture and Oregon Department of Fish and Wildlife.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

> OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

April 20, 2009

Steven Ellis, Supervisor Wallowa-Whitman National Forest 1550 Dewey Ave. Baker City, OR 97814

Subject: Wallowa-Whitman National Forest Invasive Plant Treatment project EPA Project Number 06-022-AFS

Dear Mr. Ellis:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the proposed **Invasive Plant Treatment** project (CEQ No. 20090057) on Wallowa-Whitman National Forest in Wallowa, Baker, Malheur and Grant Counties, OR and Adams and Nez Perce Counties, ID. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The draft EIS evaluates the potential environmental effects of a proposal to contain, control, eradicate, and suppress invasive plants on almost 23,000 acres of the Forest, which are currently infested with weeds and targeted for treatment until no more treatments would be needed or changes to this EIS become necessary. In assessing environmental effects associated with the project, the Forest Service (FS) analyzed four alternative actions (A through D), including a No Action (Alternative A). The draft EIS does not identify a preferred alternative action. All action alternatives (B-D) are essentially the same, except that there would be no broadcast application of herbicides in riparian areas and aerial sprays under Alternative C and D, respectively. Herbicide use would be approved on 21,000 acres. In addition, the project includes design features to reduce potential impacts and to detect new infestations early. If the project was implemented as currently proposed, the FS believes that it would result in no significant impacts to resources in the project area.

EPA understands the risks of untreated invasive plants. We appreciate FS planning efforts for this project, especially the consideration of public scoping comments in the development of this EIS and incorporation of Integrated Pest Management (IPM) principles in the project plan. We promote IPM because it is a prudent approach to understand and better deal with environmental concerns resulting from invasive plant treatments. The IPM strategy promotes an understanding of pest life cycles and application of effective pest control methods, including judicious use of herbicides.

In general, we agree with the proposed invasive plant treatments to improve resource conditions in the project area. However, we are concerned about the project's potential impacts



to water quality within impaired water bodies that are on Idaho and Oregon's most current 303(d) lists, primarily for exceedances of temperature. Planned activities include vegetation removal, which may result in thermal modification for 303(d) listed waterbodies, especially where treatments would occur close to these waters. If livestock grazing activities were added to invasive treatments, the cumulative thermal effects could even be more significant. We recommend that the FS continue to work with Idaho and Oregon Departments of Environmental Quality to assure that the state water quality standards will be met. In addition, the FS should work with the Nez Perce Tribe, and Confederate Tribes of Umatilla and Warm Springs to address their water quality issues, if any. The final EIS should include additional information as discussed in the comments below.

Water quality

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act requires each State and Tribe with approved water quality standards to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated designated uses.

While the draft EIS identifies impaired water bodies within the project area and parameters for which they were listed (Table 38, p. 254), it does not include data about water quality criteria specifically, what the numeric water quality standard exceedances are for listed waters. Without this information, it is difficult to know whether the proposed weed treatments will exacerbate conditions in impaired streams or not. Additional information that may be useful can be found in a recent Memorandum Of Agreement (MOA) (September 28, 2007) between EPA and FS which identifies specific actions that can be taken to address water quality impairments and restoration on national forest system lands.

We are concerned that treatments near 303(d) listed waters or road ditches that drain into waterways could further degrade water quality. Because information about the level of herbicides that may reach waterways and potential adverse sublethal effects was not included, it is possible that impacts to water quality could be more significant than anticipated.

Recommendations:

- The final EIS should include numeric standards for which impaired streams are listed and data demonstrating that state water quality standards would be met.
- The final EIS should identify added precautions that will be used when applying treatments near streams or road ditches that drain in the streams to minimize or avoid drift impacts and sublethal effects to aquatic life. For example, FS should avoid application of Picloram and other herbicides with very high movement rate to water sources within annual flood plains with water table close to the surface and high soil permeability.
- The final EIS should include a discussion on how invasive plants found within buffer zones would be treated and the precautions to be taken to protect water quality and aquatic life.



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 Because broadcast and aerial spray of herbicides have potentially higher risks of contaminating waterways, the FS should select an Alternative that limits or excludes use of these techniques in applying herbicides around waterways and other sensitive resources.

Monitoring

Monitoring and reporting will are valuable components of the proposed invasive plant treatment project. It is important to monitor results of weed treatment activities to document and assure effective weed treatment with minimal impacts on non-target species and avoidance of other adverse environmental or public health effects.

Recommendations:

- Monitoring should incorporate following elements:
 - Density and rate of weed spread and their effects.
 - Effects of herbicides on noxious weeds and non-target plant mortality.
 - Establishment and effectiveness of biological control agents.
 - Presence of herbicide in surface or ground water in high risk areas (i.e. accidental spills, aerial application).
 - Overall, results of the proposed treatments in terms of their effectiveness of control and environmental consequences, and in meeting the goals of the 1964 Wilderness Act. Almost 1,000 acres of invasive weeds are within wilderness areas (p. 359).

Other comments:

- The draft EIS indicates that the proposed project would cover about 23, 000 acres. Information on page 91 also indicates that the life of the proposed project would be a maximum of 40,000 acres. Figure 16 on page 107 further shows a declining trend when comparing the spread of invasive plant between now and when the proposed project will be complete in year 2020. It is not clear what the actual project treatment area is - 23000 or 40000 acres. The final EIS should clarify what the life of the project would be and appropriate rate of invasive plant infestation on the forest.
- On page 257, the draft EIS states that no invasive plant treatment of any kind is proposed for the Baker watershed. It is not clear, whether invasive plants exist in the watershed and if yes, how they would be treated to protect sources of drinking water in the watershed. Please provide that information in the final EIS.
- Section 2.3.6 (p. 83) indicates that new herbicides approved by the EPA may be used by the project to treat invasive plants. Because it is virtually impossible for EPA to identify all conceivable risks and address all uncertainties associated with pesticide use, it would be prudent to first assess the impacts of new herbicides on local resources and take additional precautions before their use. The final EIS should provide information about



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the process that would be followed in selecting new herbicides for use on the forest and their adverse sublethal effects.

Because of concerns about water quality and missing or unclear information, we have assigned a rating of EC-2 (Environmental Concerns – Insufficient Information) to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. For your reference, a copy of our rating system used in conducting our review is enclosed.

If you have questions or you would like to discuss the above comments, please contact Theo Mbabaliye at (206) 553-6322 or me at (206) 553-1601. Thank you for the opportunity to provide comments on the proposed project.

Sincerely,

/s/ Christine B. Reichgott, Manager Environmental Review and Sediment Management Unit

cc:

EPA Oregon Operations Office EPA Idaho Operations Office Confederated Tribes of Warm Springs Confederated Tribes of Umatilla Nez Perce Tribe

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United States Department of the Interior

OFFICE OF THE SECRETARY Office of Environmental Policy and Compliance 620 SW Main Street, Suite 201 Portland, Oregon 97205-3026



9043.1 In reply refer to ER09/275

Electronically Filed

April 20, 2009

Steven A. Ellis Forest Supervisor Wallowa-Whitman National Forest P.O. Box 907 Baker City, Oregon 97814

Dear Mr. Ellis:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Wallowa-Whitman National Forest Invasive Plants Treatment Project, Wallowa, Union, Baker, Malheur, Umatilla, and Grant Counties, Oregon; and Adams and Nez Perce Counties, Idaho. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

10 500

Preston A. Sleeger Regional Environmental Officer



United States Department of the Interior

BUREAU OF LAND MANAGEMENT Vale District Office 100 Oregon Street Vale, Oregon 97918

IN REPLY REFER TO:

1790

APR 2 1 2009

Steve Ellis, Forest Supervisor Wallowa-Whitman National Forest P.O. Box 907 1550 Dewey Avenue Baker City, OR 97814

Dear Steve,

The Vale District Bureau of Land Management would like to thank you for the opportunity to comment on the Wallowa-Whitman National Forest Invasive Plants Treatment Project Draft EIS. The availability of the tools and strategies described in the Proposed Action Alternative, Alternative B, provide for a comprehensive and proactive program which would integrate well with the tools and strategies available to the majority of the weed fighting partners in this region.

It is critical that the Wallowa-Whitman is successful in getting a decision on this EIS that allows for the use of additional chemicals and considers all methods of chemical application, in addition to the mechanical, cultural, and biological methods. A number of the most invasive and aggressive noxious weeds that occur on the Forest and neighboring BLM lands are not controlled by chemicals that are currently available to our agencies. The chemicals proposed for use under Alternative B will be more selective, thus limiting off target effects and decreasing potential risks to human health and safety. The BLM is currently preparing a Statewide Vegetation Treatment Environmental Impact Statement. The Vale District will prepare an Environmental Assessment to tier to this document in the next few years, which will propose tools and strategies complementary to those described in Alternative B of the Draft EIS. Therefore, the BLM is in support of Alternative B, the Proposed Action Alternative.

Early Detection and Rapid Response (EDRR) to address new sites is a particularly important tool. Without an EDRR strategy, new, easily controlled sites can quickly become large and expensive to treat. If treatment is delayed, the likelihood of resource degradation increases, as does the costs associated with restoration. I am concerned that the EDRR strategy does not allow for aerial treatment. Helicopters can make very precise spot treatments and are appropriate to use in areas that are rugged and inaccessible. The safety risks that these sites pose to humans and pack stock are great and could significantly increase the cost of treating in these areas both financially and temporally.

Page 2

Since it is typical that the life of an Environmental Impact Statement is 10-20 years, I am concerned that this document does not include the treatment of submerged and/or floating aquatic invasive plants. It seems implied that the document is referring to chemical treatment of aquatics (page 19) but could also be interpreted to mean that any treatment of aquatic invasive plants is not authorized in this plan. Mechanical removal of aquatic plants is often an effective tool and should be considered as a treatment option. Given the rapidity with which weeds spread, and the increased use of our region's waterways, it is foreseeable that aquatic invasive plants will arrive and need to be addressed before the next EIS is prepared. The chance that aquatic invasive plants will appear on the Forest should be considered under EDRR and analyzed in this plan.

Weeds do not recognize political or jurisdictional boundaries and are best controlled through coordinated multijurisdictional efforts. The partnerships that have been forged and maintained in this corner of Oregon and on into Idaho and Washington are well respected and recognized nationally. This ongoing partnership between federal, state, and local agencies and private landowners will be significantly strengthened by the Forest's ability to use the tools and strategies described in the Proposed Action Alternative.

Sincerely,

David R. Henderson District Manager Vale District Wallowa-Whitman National Forest Invasive Plants Treatment Project Draft EIS Comments

General comments:

- Maximizing the effective treated acres is critical to getting in front of the invasive plant increase in acres. If we do less, we will continue to lose ground. Alternative B, the proposed alternative, is the only one that shows a chance of perhaps decreasing the amount of infested acreage.
- Early Detection Rapid Response capability is crucial. The absence of such a tool has crippled federal efforts to slow or stop the spread of invasives in the past. Repeated analysis of any "new" sites prior to doing anything to stop the spread has led to more and more acres needing treatments, and ultimately to an increase in both costs and pesticide use on both federal and adjacent private land.
- Adaptive management ,as used on page 40, capability is key. We must be able to adapt to climate change as well as new science. for instance, we now know based on experience across the state, that for Japanese knotweed, cutting in combination with herbicides (listed as preferred in the document) is only effective when using the herbicide Habitat. When using glyphosate or triclopyr DO NOT cut prior to fall treatment. In fact the best treatments done are with Habitat plus glyphosate AND there is developing evidence that, after two years of treatment, allowing a year off from treatment allows the plants to recover a bit from herbicide stress and significantly increase results from the subsequent third treatment. Quite frequently, implementation of biological controls requires adaptive changes to treatment regimes, particularly as it relates to timing of treatments.

Specific comments:

Project Design Features:

I-3 - It is possible to protect SOLI with buffers in time rather than space. Using short or no residual herbicides when non-target plants are dormant and the target plant is susceptible works very nicely. The non-targets are actually safer since there is no potential for contact with the herbicide but the potential for displacement by the invasive is removed. An example would be using clopyralid on rush skeletonweed in October-December treatment window in areas where the skeletonweed is invading McFarlane's 4'O-clock habitat.

Common Control Measures:

- references to repeated mowing as damaging to natives but no mention of damage to natives from tarping. My experience has been that tarping is completely indiscriminate often causing more damage to native systems than to the invasives.
- Field bindweed information is completely wrong. Field bindweed is a creeping perennial NOT an annual. Pulling is a complete waste of time and a biological control is available.

- Blackberry: manual treatment alone is ineffective. Fall herbicide treatments alone or on regrowth follwing cane removal is effective.
- Japanese knotweed: mechanical treatment is ineffective alone. Injection has been almost completely abandoned because of lack of efficacy, cost, and potential for exceeding label limits. The small shoots invariably escape since they are too small to inject. The legal limit for injecting comes to about 5000 stems per acre. It is very common for areas to far exceed this number of stems per acre.
- Leafy spurge: manual treatment has been shown to increase stem density and biomass.
- Medusahead: This is one that information is starting to become increasingly available for. The thatch buildup is being shown to be very important, the implications here for use of fire are huge, whether it is prescribed fire or just using the fires that occur in spite of our efforts. In many cases it is being shown that it is important to capture the site rapidly following control or fire. Part of the developing strategy to do this is the TEMPORARY use of non native perennial grasses to stop the cycle of annual grasses. It is then relatively easier to remove these grasses and replace them with natives, than to go directly to natives from the annual grass stand. The important thing is to have a FIRM COMMITMENT to that future transition to natives.
- Scotch broom: biocontrols are available in Western Oregon. They have never been released in Eastern Oregon. There is some reason to believe they wouldn't survive our harsher environment. Scotch broom is being treated everywhere it is found and should not be proposed for biological control in this document.
- Tansy ragwort: biocontrols are available in Western Oregon. Repeated releases of the strains from W. Oregon have repeatedly failed east of the Cascades. ODA has made releases of a Swiss strain of the ragwort flea beetle on private land infestations in Umatilla and Union County in the last two years. Results of those releases is not yet known. Pulling of ragwort in moist areas usually results in numerous new rosettes forming from the root fragments. We used to propagate the stuff from root cuttings. Clopyralid is by far the herbicide of choice and the tool of choice until we develop a solid biocontrol option for Eastern Oregon. Section on various alternatives impacts on SOLI;
 - argues that there would be more impacts to SOLI with the proposed alternative. I would disagree based both on the selectivity of the newly available herbicides when the timing of application is taken into account, and most importantly the long term impacts caused by a reduction in the number of acres treated under the other alternatives and the potential lack of EDRR capabilities under some. More weeds impacting more ground over more time will compound the situation to far exceed any potential for impacts by proposed treatments.
 - The restriction on possible riparian treatments in alt. C would reduce to effectively nothing the ability to attack large Knotweed and blackberry

stands and to halt Common bugloss encroachment into McFarlane 4"Oclock habitat on the lower Imnaha by way of the river bars. Blackberry is becoming a serious issue among some weed professionals in Eastern Oregon. I submit that it will be a far larger problem than in Western Oregon if only because our riparian areas are such an important part of our more arid landscape. Virtually every Hells Canyon creek supports blackberry at some level, just waiting for the next fire to open up the riparian area for more blackberry.

Section 3.6.3 Effects common to recreation

- refers to stem injection as affecting only target plants. There are documented cases (not uncommon) of stem injection of Japanese knotweed causing mortality to adjacent shrubs.
- refers to chemical treatments leaving dead vegetation that would be noticeable for weeks or months. Not necessarily true. Many of the treatments that are most effective for perennial or biennial plants are in the fall. In many cases there is functionally no visible impact, as well as a much smaller visitor impact since use is lower during that season.

I want to reiterate my support for Alt B. It will give us the best option for reducing the impacts of invasive plants. Given the increasingly grim budget forecasts doing the most acres effectively for the least amount of money is going to be more and more important.

Thank you for your consideration Daniel B. Sharratt Oregon Department of Agriculture Noxious Weed Section 309 W Fir Union, OR 97883





Department of Fish and Wildlife Northeast Regional Office 107 20th Street La Grande, Oregon 97850 Phone: 541-963-2138 Fax: 541-963-6670 http://www.dfw.state.or.us/

April 16, 2009



Wallowa Whitman National Forest Attention: Steve Ellis 1550 Dewey Avenue Baker City, OR 97814

Dear Mr. Ellis-

The Oregon Department of Fish and Wildlife (ODFW) would like to thank you for the opportunity to comment on the Wallowa-Whitman National Forest Invasive Plant Treatment Draft Environmental Impact Statement (DEIS). The DEIS is a well written document that addresses many of ODFW's concerns about noxious weed populations on the Wallowa-Whitman National Forest (WWNF).

ODFW supports Proposed Action- Alternative B. Alternative B would provide the WWNF with the tools it needs to effectively treat invasive plant populations. Under Alternative B, the WWNF would have the ability to use chemical, physical, biological, cultural and Early Detection/Rapid Response treatments. The broader list of herbicides and aerial herbicide application in designated areas will improve treatment effectiveness and success. We would also like to encourage the WWNF to consider adding some flexibility in designating additional areas for aerial treatment.

Currently, a partnership between the USFS and ODFW exists that addresses invasive plants- i.e. project cost sharing and herbicide purchase. Future projects are anticipated and we look forward to partnering with the USFS.

ODFW believes that Alternative B will substantially improve the control and eradication of invasive plants, thus improving fish and wildlife habitats and overall forest health. Thank you for an opportunity to comment on controlling invasive plants.

Sincerely,

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S. Craig Ely NE Regional Manager Oregon Department of Fish and Wildlife



5.3 Processing and Evaluating Public Comments

All letters and comments received about the Draft EIS were reviewed in their entirety. Comments were processed using the content analysis method, which consolidates substantive comments by subject, and helps resource specialists (wildlife biologists, hydrologists, etc.) respond to comments in their area of expertise. Substantive comments are those that relate specifically to the proposed project. All comment letters are located in the project record. The names of all respondents are listed below with an identification number.

Some comment letters were voluminous in nature; therefore, to keep this chapter to a reasonable size only the portions of comments that provided the main points or key issues are included here. Responses to comments are focused on comments raising issues, concerns or problems.

Table 85-List of respo	ondents with identifi	ication numbers
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ID #	First Name	Last Name	Title	Organization Name	City	State	Notes
1	Lyle	Defrees			Baker City	OR	supports the proposed action, worried about spread by OHV
2	Jan	Alexander	Minerals Policy Coordinator	Eastern Oregon Mining Association	Unity	OR	supports the proposed action, supports planting pervasive exotics, worries that random road closures will promote spread
3	H.E. Beau	McLendon	Manager	Goat Horn Ranch	Cove	OR	supports the proposed action, use goats
4	Nancy	Dake,	Manager	Union County Weed Board	La Grande	OR	supports the proposed action, supports EDRR and broadcast application of herbicides
5	Lia	Spegiel	Entomologist	Blue Mtn. Pest Management Service Center	La Grande	OR	supports the proposed action
6	Dave	Clemons			Richland	OR	supports the proposed action
7	Daniel	Sharratt		Oregon Department of Agriculture, Weed Control	Union	OR	supports the proposed action, comments on PDFs, CCM and SOLI
8	Doug	Heiken		Oregon Wild	Eugene	OR	offers a list of recommendations to improve the proposal, also attached earlier comments to the R6 2005 EIS
9	Greg	Winans		Tri County CWMA Director	Baker City	OR	supports the proposed action, offers suggestions
10	Nancy	Dake		private landowner	La Grande	OR	supports the proposed action
11	Jerry	Asher					supports the proposed action, offers suggestions, focus is HCNRA

ID #	First Name	Last Name	Title	Organization Name	City	State	Notes
12	Marc	Porter	Coordinator	Wallowa Canyonlands Partnership, Wallowa Resources	Enterprise	OR	supports the proposed action, supports broadcast treatments and EDRR
13	Jon	Paustian		Oregon Dept. of Fish and Wildlife	La Grande	OR	supports the proposed action, add flexibility to aerial treatment area designation, more partnerships in the future
14	Brian	Kelly		Hells Canyon Preservation Council	La Grande	OR	supports prevention measures and EDRR
15	Theogene	Mbabaliye		US EPA Region 10	Seattle	WA	water quality, monitoring, other comments
16	Preston A	Sleeger	Regional Environmental Officer	US Department of the Interior	Portland	OR	sent electronically by Mandy Stanford, DOI has no comments
17	Brett	Dumas	Environmental Affairs	Idaho Power Co.	Boise	ID	supports the proposed action
18	Lawson	Denny			Elgin	OR	supports the proposed action
19	Mike Hayward, Dan DeBoie	Susan Roberts		Wallowa County Board of Commissioners			supports the proposed action
20	Ross	Shumway		Upper Burnt River Weed Control District	Bridgeport	OR	supports the proposed action, flexibility with new chemicals
21	Karen	Coulter	Director	Blue Mountain Boidiversity Project	Fosil	OR	Opposes herbicide use in most cases, supports prevention
22	Arnie	Grammon	Supervisor	Baker County Weed Control	Baker City	OR	supports the proposed action (late)
23	Dale	Henderson	District Manager	Vale District BLM	Vale	OR	supports the proposed action, EDRR, Coordination with partners (late)
24	Jerry	Asher					Spotted Knapweed is in HCNRA (late)
25	Berta A.	Youtie	Chair	John Day/Snake Resource Advisory Committee	Baker City	OR	supports the proposed action

Wallowa-Whitman National Forest Invasive Plants Treatment Final Environmental Impact Statement

5.4 FS Direction Relative to Comments and Responses (1909.15 Chapter 20)

(a) An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement. Possible responses are to:

- (1) Modify alternatives including the proposed action.
- (2) Develop and evaluate alternatives not previously given serious consideration by the agency.
- (3) Supplement, improve, or modify its analyses.
- (4) Make factual corrections.
- (5) Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

One or more possible response types (1-5 above) are used for each comment in the table below.

5.5 Responses to Comments

5.5.1 Comments and Responses by Topic

Comments are segregated by topic and topics are arranged in alphabetical order. Each comment is followed by the identification number of the individual(s) that made the comment. Comments are in bold type. In order to find comments by subject more quickly, please see the following index:

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Implementation	530
Monitoring	531
New Herbicides	532
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Not in Favor No Action	529
Not in Favor of Alternative C	530

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Proposed Action	534
Purpose and Need	541
Trails and Campground Monitoring	543
Treatment Effectiveness	543
Tribes	545
Water	545
Wildlife	546

Alternatives

1 COMMENT: Alternative C_should require future detections of invasive plants to be controlled by nonherbicide means. (21)

RESPONSE: No Action currently allows for new detections to be controlled by nonherbicide means. Alternative C is designed to resolve a specific issue about broadcast herbicide near streams and includes restrictions on such use under EDRR.

2 COMMENT: The Forest Service is overly reliant on chemical treatments and overly dismissive of nonchemical methods. The Forest Service should have considered nonchemical alternatives (and strictly limited chemical alternatives) even if such methods were thought to be less effective because (1) the Forest Service needs to conduct the NEPA analysis before they conclude that the nonchemical treatments are not effective, (2) the Forest Service needs to compare and disclose the effects of the chemical and no-chemical methods so they are fully informed of the trade-offs, and (3) nonchemical treatments and no-action are not the same thing. (8)

RESPONSE: The Forest Service considered many alternatives that would restrict the use of herbicides. A no herbicide alternative was considered but eliminated from detailed study. Such an alternative was fully considered and rejected in 1995. The 2005 R6 FEIS also concluded that herbicides would be needed to effectively treat existing populations of invasive plants. The current program (No Action or No Change Alternative) allows some herbicide use, but is not effectively treating invasive plants. A wider range of herbicide options and an EDRR approach are necessary to contain, control and/or eradicate many invasive species (see Common Control Measures). A "no herbicide" alternative would not meet the purpose and need for action. Treatments by manual and mechanical means would continue to be available under No Action and all action alternatives and will be used where cost-effective.

3. COMMENT: Using toxic herbicides near SOLI plants or culturally important plants may kill these plants, which is ignored in the discussion on page 83. Excluding herbicide is not the same as excluding treatment. (21)

RESPONSE: Language added in section 2.3.5 that states, "Treating with herbicides may impact individuals but would not threaten SOLI populations. Rather, nonherbicide treatments may be ineffective, threatening SOLI habitat by allowing the spread of invasive plants."

4. COMMENT: Re table 12: How can every alternative be determined to be of minimal risk to people and the environment, when there are obvious differences in table 13? (21)

RESPONSE: All action alternatives include a suite of design features that minimize potential for herbicide exposure, as required by the R6 2005 ROD. The action alternatives (Alts B, C & D) have been analyzed in detail for effects to the natural and human environment. Although there are differences in the amount of potential exposure, even the alternative that would result in the greatest potential level of exposure (Alt B) minimizes risk.

5. COMMENT: Broadcast and aerial spray should not be allowed. All action alternatives increase herbicide use. This is an inadequate range of alternatives. (21)

RESPONSE: The DEIS considered, in addition to the three action alternatives, five other alternatives that covered a broad array of herbicide use including 'no herbicide use.' These alternatives were not fully developed because they would not resolve issues any better than the other action alternatives, are not necessary to meet environmental standards, and would substantially reduce the effectiveness of the project.

6. COMMENT: Page 82 of the DEIS states that under a restricted herbicide alternative, manual and mechanical treatments in the restricted use area remain untreated until after lands available for herbicide use were treated. Why is that, other than an obvious bias toward herbicide use? (21)

RESPONSE: : Herbicide use will be emphasized under action alternatives following this decision because manual/mechanical methods, used for the past several years failed to effectively control new sites. This is why the acreage of known sites has increased dramatically increased since the current program was implemented (see Alt A, pg 24). Herbicides also cost more compared to manual/mechanical methods (see table 78).

7. COMMENT: It is a form of blackmail not to combine protections of no broadcast spraying and no aerial spraying to maximize protection from herbicide impacts. (21)

RESPONSE: The alternatives were designed to address public issues and these restrictions could be combined in the final decision.

8. COMMENT: Very little difference between alternatives. There are no alternatives that would avoid toxic herbicide use, place more emphasis on manual/mechanical control, or even avoid both aerial and broadcast spraying. There is no consideration of prohibiting herbicide use in critical wildlife habitat, critical fisheries habitat, near drinking water sources, near crops, in Native cultural food areas, in public edible and medicinal plant gathering areas, despite the common sense nature of such protection measures. All of the concerns addressed by alternatives considered but not developed are reasonable and well supported by credible science yet are disregarded. (21)

RESPONSE: The DEIS considered, in addition to the three action alternatives, x other alternatives that covered a broad array of herbicide use including 'no herbicide use.' These alternatives were not fully developed because they would not resolve issues any better than the other action alternatives, are not necessary to meet environmental standards, and would substantially reduce the effectiveness of the project. The No Action alternative already includes herbicide use in some of these areas; there is a need for more effective treatments to control invasive plants in accordance with the R6 2005 ROD.

9. COMMENT: Effect of PDFs for Issues 4 and 5 in table 13 should describe net results of application of PDFs. Not just say PDF is intended to minimize, say what the effect will be. (21)

RESPONSE: Issues 4 and 5 in Tabel 13 have been edited to identify the net result of applying PDFs.

10. COMMENT: Early Detection/Rapid Response (ED/RR) sites that are appropriate should be included in aerial applications. An ED/RR site of 20 or 100 acres in the rugged back country might be treated effectively and precisely with a helicopter for a reasonable price while hand treatment may be too expensive to actually implement. (25)

RESPONSE: Aerial treatment of additional sites is outside the scope of this project because the aerial treatment is perceived to be of greater public concern than other methods. If new, large sites are discovered that necessitate aerial herbicide application, additional NEPA would be completed. The new analysis is likely to tier to this FEIS.

11. COMMENT: We would like to see a process identified for adding new herbicides that may be more environmentally friendly. If new herbicides are similar to approved ones, consistent with risk analysis, and less toxic to the environment; we would recommend the Forest add them in a timely manner perhaps with a supplemental document to the EIS. (25)

RESPONSE: The updated list of chemicals authorized for use are discussed thoroughly in the Region 6 FEIS and ROD (USDA Forest Service 2005a) and have been added for use by the Forest and contractors through a Forest Plan amendment. Adding new chemicals in the future would require the same risk assessment that has been done on each of the 10 approved chemicals would also require separate NEPA analysis and would also require a Forest Plan amendment to authorize its use.

Biological Control

12. COMMENT: There are problems with biocontrol agents spreading through the Forest with consequences to native plants, insects and the ecological web. This has not been assessed. (21)

RESPONSE: Effects of biological agents have already been analyzed and documented by APHIS and Appendix J of R-6 2005 FEIS (see pg 129)

Botany

13. COMMENT: Pg96 paras 3, 4, 5 and pg 97, paras 1, 2, 3, 4, 5. Since so many people either wonder or believe hand pulling, or mechanical methods should be the treatment of choice instead of herbicides, these paragraphs need to be expanded considerably and strengthened to better reflect reality. As written, in combination, they can give the reader too strong of an impression about how applicable these methods are to the Wallowa Whitman Forest, and especially the HCNRA. Pg96, entire para5. Do these examples provide realistic expectations for the Wallowa Whitman conditions especially in the HCNRA? The literature referenced here and on pg 97 needs to be carefully reviewed and then commentary placed in those paragraphs regarding: the size of the infestations, the specific invasive species, remoteness/access, vicinity to populations of volunteers, terrain, and size of invasive species populations in comparison to the remote conditions prevailing on the majority of sites covered in this EIS – especially in the HCNRA. Page 96 and 97 needs a major rewrite effort to reflect reality. The inexperienced reader or the nonherbicide advocate can easily get the impression or leverage that nonherbicide treatments are more applicable than they are on the Wallowa Whitman- especially in the HCNRA. Perhaps this matter is covered adequately elsewhere in the EIS. If it is then I suggest referencing that here, more than once, so the reader does not accidentally take these impressions out of context. (11)

RESPONSE: Additional comments added to referenced section that localizes the feasibility of manual mechanical methods.

14. COMMENT: Pg102, paras 2,3,4. It is good to hear the positive aspects of bio-control. However, rather than leave the reader with an overly optimistic view of bio-control, more of the whole picture needs to be stated. Suggest describing some of the limitations of bio-control. Bio-control agents are not available for many of the serious weeds. Where fairly effective bio-agents are available, they may reduce but do not stop the spread of the invasive plants. A more balanced narrative is needed to avoid giving to high of an expectation for nonherbicide treatments. (11)

RESPONSE: Edited section to clarify that biocontrol is limited to invasive species that have known biocontrol agents.

15. COMMENT: Pg 139, Paras, 5,6,7. This alternative results in less control of yellow starthistle. The effects of that needs to be described in this chapter, i.e. more seed, more spread to surrounding areas, which then spread to more distant surrounding areas for many years. (11)

RESPONSE: The FEIS contains more information about yellow starthistle.

16. COMMENT: Pg141, Para 3, Lines 4 and 6. Seems like those negative impacts need to be described in as much detail as possible (at least listed, i.e. wildlife, erosion, rare plant competition, etc) because that provides so much of the explanation of the true need for herbicide. (11)

RESPONSE: Language has been added to the FEIS to acknowledge adverse effects to native plant communities and wildlife dependent on those plant communities.

17. Pg144, Last para, Since alternative C and D allow a large number of invasive plants to continue to multiply and spread, isn't that a major cumulative impact upon native vegetation, wildlife, fish, rare plants, fungi, etc. If so, doesn't that need to be stated? (11)

RESPONSE: language added to distinguish the adverse effects to native plant communities of the less aggressive treatment of invasives under alternatives C and D.

18. COMMENT: Pg109, para 6, line 5: Does this sentence imply that a specific project to treat Ventenata, not associated with other weeds, is not covered under this EIS? Ventenata was uncommon on the Ochocco National Forest ten years ago. Now it is common. It is showing up more and more on the Umatilla National Forest. Dr. Richard Prather, University of Idaho, has studied the spread of Ventenata since 1987. He is concerned about its current "alarming spread" in the grasslands and canyons of the Palouse Prairie where it has gone from being rather innocuous to dominating large areas. He says it is well adapted to the Idaho fescue/blue bunch wheatgrass/balsamoriza vegetative types. Therefore, in case a project is needed in the HCRNA to keep ventenata from encroaching into an area not yet infested with it, perhaps the language needs to be changed to appear less restrictive. (11)

RESPONSE: This species is too well established and abundant to treat everywhere it occurs on the Forest, but it could be treated where encroaching on uninfested or special areas under EDRR. It may also be treated where it occurs with other invasive plants that are targeted for treatment. Edits have been made to page 115 to clarify treatment.

19. COMMENT: We further ask that the DEIS address the increasing populations of Ventenata dubia and Bromus tectorum. (14)

RESPONSE: These species are too well established and abundant to treat in some areas, but could be treated where encroaching on uninfested or special areas such as Hell's Canyon. Edits have been made to page 115 to clarify treatment.

20. COMMENT: Based on the company's experience with hand-pulling noxious weeds, and the under-estimation of weed population postulated above, the emphasis put on this technique in the alternatives present an overly optimistic view of its feasibility and level of effectiveness. (17)

RESPONSE: Edits have been made to pages 98, 99 to clarify realistic opportunities for manual control of weeds.

21. Section on various alternatives impacts on SOLI argues that there would be more impacts to SOLI with the proposed alternative. I would disagree based both on the selectivity of the newly available herbicides when the timing of application is taken into account, and most importantly the long term impacts caused by a reduction in the number of acres treated under the other alternatives and the potential lack of EDRR capabilities under some. More weeds impacting more ground over more time will compound the situation to far exceed any potential for impacts by proposed treatments. (7)

RESPONSE: The DEIS discusses both the potential for effects to SOLI from invasives (which is the part of the reason action is needed to eradicate, control, and/or contain invasive plants and restore treated sites) and the effects from treatment, and acknowledges the low potential harm to SOLI from herbicide use in the project.

22. COMMENT: PDF I-3 - It is possible to protect SOLI with buffers in time rather than space. Using short or no residual herbicides when nontarget plants are dormant and the target plant is susceptible works very nicely. The nontargets are actually safer since there is no potential for contact with the herbicide but the potential for displacement by the invasive is removed. An example would be using clopyralid on rush skeletonweed in October-December treatment window in areas where the skeletonweed is invading McFarlane's 4'O-clock habitat. (7)

RESPONSE: The PDFs already provide adequate protection so this restriction is unnecessarily complex and may reduce effectiveness. Herbicide would be applied when most effective for treating the target species.

23: COMMENT: Tarping is completely indiscriminate often causing more damage to native systems than to the invasives. (7)

RESPONSE: This is accurate and has been acknowledged in the Common Control Measures Table.

24. COMMENT: How does this project avoid population shifts from repeated use of the same herbicide, which may reduce plant diversity and cause [soil] nutrient changes? (21)

RESPONSE: Repeated herbicide use on the same site would not necessarily occur as inferred by the commenter. The follow quote from the FEIS section 2.2.3 more accurately portrays how repeat treatment decisions are made. "Once initial treatment is complete, future potential treatment is evaluated based on the current condition compared to the desired condition. Achieving desired conditions includes future reduction of herbicide treatment methods when site conditions favor effective nonchemical treatments." Further where high priority invasive species exists, plant diversity is intentionally altered to replace the invasives with one or more native plant species. Occupancy by native species may occur through natural encroachment or by seeding. Please see topic "Herbicide Effects on Plant Diversity" in section 3.2 and the Revegetation Guidelines Document in Appendix B for detailed.

25. COMMENT: We are concerned about the lack of scientific data for broadcast and aerial drift effects to nontarget, nonvascular plants. (21)

Chapter 5 RESPONSE: There are uncertainties related to effects on nonvascular plants, however these are not resolvable at the project scale. Post-treatment monitoring will attempt to detect effects on nontarget vegetation, including nonvascular plants. Such effects are not expected because PDFs reduce potential for exposure.

26. COMMENT: How exactly will the Forest Service maintain the viability of botanical species with the use of herbicides, especially in the absence of surveys and known viability thresholds. (21)

RESPONSE: Effects would be limited due to small overlap and selective treatments. PDFs would minimize risk of harm to botanical SOLIs and other nontarget vegetation. Surveys would be done in the vicinity of treatment prior to treatment to make sure individuals are protected. While the EIS acknowledges that all risk to individuals cannot be completely avoided, potential for effects on species viability are not possible.

27. COMMENT: We are concerned by the lack of scientific data to indicate herbicide tolerance for nonvascular species. We request that these and other botanical SOLI be buffered from herbicide use. Herbicides by definition will kill plants and there are many sensitive plants in the area. (21)

RESPONSE: Known SOLIs will be buffered from herbicide use. Herbicide impacts on nontarget plants are based on SERA Risk Assessments and other information about herbicide properties. Uncertainty about impacts to nonvascular plants would be addressed through post-treatment monitoring and buffers adjusted if necessary (see "Herbicide Effects on Lichens and Bryophytes" in section 3.2.3).

28. COMMENT: A precautionary approach to herbicide use should be taken given uncertainties related to herbicide effect on pollinators. Direct impacts to pollinators are not adequately analyzed (see page 137). Thus, maximum application rates should not be used. (21)

RESPONSE: The SERA risk assessments (R-6 FEIS 2005) describe the toxicity of each herbicide relative to honeybees. Herbicide use as proposed for this project would not be extensive or intensive enough to have a discernable effect on pollination. Chapter 3.2 describes the potential impacts of herbicides to target and nontarget plants including native species. Maximum application rates (Table 4, Chapter 2) would rarely, if ever, be used.

29. COMMENT: No quantification or qualification of native pants makes it impossible to judge whether losses really are acceptably minor; what if the loss is the last few of a rare plant in a given area. (21)

RESPONSE: This information is shown in table 22 and 23, where the number of known populations is given for SOLI. Table 25 lists number of sites by treatment alternative. Nontarget plants are protected by PDFs; effects are limited to the application site.

30. COMMENT: Botany cumulative effects write up starting on page 140 is biased toward effects of invasive plant spread and needs more about effects from toxic chemicals and other control methods. (21)

RESPONSE: Effects of chemical and other control methods are direct and indirect effects. The direct/indirect effects of herbicide treatment are reported in section 3.2.3.

Control Measures

31. COMMENT: We question the rationale for the proposal to aerially spray Scotch thistle as shown in Appendix F (page F-6). Additionally, the largest mapped area shown on this page appears

to be located in a riparian area of Downey Gulch. We request clarification about this proposed treatment. (14)

RESPONSE: The two Scotch thistle sites are not rated as having a high risk for groundwater contamination or wind translocation (Appendix D, Table D-1). Appendix F, Table F-1 acknowledges that 83 acres of aerial application sites would be buffered from aerial application and would need a ground-based method of application or alternative treatment. Buffers identified in Chapter 2, Tables 7-10 still apply, even though the mapping shows the site to extend across Downey Gulch.

32. COMMENT: Field bindweed information is completely wrong. Field bindweed is a creeping perennial NOT an annual. Pulling is a complete waste of time and a biological control is available. (7)

RESPONSE: Corrections made to Common Control Measures Table 5

33. COMMENT: Blackberry: manual treatment alone is ineffective. Fall herbicide treatments alone or on regrowth follwing cane removal is effective. (7)

RESPONSE: Corrections made to Common Control Measures Table 5

34. COMMENT: Tansy ragwort: biocontrols are available in Western Oregon. Repeated releases of the strains from W. Oregon have repeatedly failed east of the Cascades. ODA has made releases of a Swiss strain of the ragwort flea beetle on private land infestations in Umatilla and Union County in the last two years. Results of those releases is not yet known. Pulling of ragwort in moist areas usually results in numerous new rosettes forming from the root fragments. We used to propagate the stuff from root cuttings. Clopyralid is by far the herbicide of choice and the tool of choice until we develop a solid biocontrol option for Eastern Oregon. (7)

RESPONSE: Corrections made to Common Control Measures Table 5

35. COMMENT: Scotch broom: biocontrols are available in Western Oregon. They have never been released in Eastern Oregon. There is some reason to believe they wouldn't survive our harsher environment. Scotch broom is being treated everywhere it is found and should not be proposed for biological control in this document. (7)

RESPONSE: Corrections made to Common Control Measures Table 5

36. COMMENT: Medusahead: This is one that information is starting to become increasingly available for. The thatch buildup is being shown to be very important, the implications here for use of fire are huge, whether it is prescribed fire or just using the fires that occur in spite of our efforts. In many cases it is being shown that it is important to capture the site rapidly following control or fire. Part of the developing strategy to do this is the TEMPORARY use of non native perennial grasses to stop the cycle of annual grasses. It is then relatively easier to remove these grasses and replace them with natives, than to go directly to natives from the annual grass stand. The important thing is to have a FIRM COMMITMENT to that future transition to natives. (7)

RESPONSE: Prescribed burning has not been included because some burning applications could actually encourage invasive weed spread. However, where wildfire or prescribed fire ignited for other purposes occur, seeding may follow to help restore native vegetation.

37 COMMENT: Leafy spurge: manual treatment has been shown to increase stem density and biomass. (7)

RESPONSE: Statement about manual treatment added to Common Control Measures Table 5.

38. COMMENT: Japanese knotweed: mechanical treatment is ineffective alone. Injection has been almost completely abandoned because of lack of efficacy, cost, and potential for exceeding label limits. The small shoots invariably escape since they are too small to inject. The legal limit for injecting comes to about 5000 stems per acre. It is very common for areas to far exceed this number of stems per acre. (7)

RESPONSE: Ineffectiveness of mechanical alone has been added to Common Control Measures Table 5.

Coordination with Others

39. COMMENT: On page 143 of the document, it is stated that "effectiveness of the proposed project would be greatly increased if there is coordination with adjacent landowners to treat across land ownerships." However we did not see anywhere in the document a plan of action for accomplishing this very important strategy. (25)

RESPONSE: In the development of individual treatment site prescriptions, under the topic of "Annual Implementation Planning" of section 2.2.3 the EIS states: "•Coordinate with adjacent landowners, water users, agencies, and partners."

Cultural Treatments

40. COMMENT: Goats are an environmentally friendly tool in the arsenal of weapons against invasive weeds. Goats are not a panacea for the problem of noxious weeds but with proper appropriate control measures, concerns about use of goats can be addressed. They are suited for areas where chemicals have to be limited and to steep rugged areas where mechanical methods are not feasible. (3)

RESPONSE: Goats are effective in certain situations which have very specific criteria. Site-specific NEPA would be appropriate for such situations, none of which have currently been identified on the W-W. The focus of this EIS is on new tools made available in 2005, used in conjunction with other methods.

Cumulative Effects

41. COMMENT: Cumulative effects of herbicide in combination with other sources could trigger problems for human health, degrade air and water quality, and have significant impacts on native plants and wildlife. Your basis for cumulative effects is faulty because: 1) no analysis of vulnerability of site-specific species to herbicide use 2) R6 2005 FEIS does not provide adequate basis for site-specific effects. (21)

RESPONSE: Cumulative effects are discussed throughout Chapter 3, the basis for cumulative effects provides overview material.

Definitions

42. COMMENT: Pg. 6, para. 4: Last sentence: Suggest further explanation, giving examples of the "expanded sites" and "new invasive plant species". (11)

RESPONSE: Edits added giving examples

Editorials

43. COMMENT: Provide more rationale for the critical need to select the Proposed Action, Alternative B and help others see the gravity and urgency related to the accelerating degradation that is underway in the HCNRA. (See suggested language) (11)

RESPONSE: suggested language added to Section 1.1 describing the diverse and rich ecosystem values of the Forest.

44. COMMENT: Pg. 1, para. 3, Seventh sentence: "Invasive plants have the potential......". The word potential leaves the reader thinking what is described in the paragraph might happen: when in fact it is happening. Suggest removing: "have the potential to". Same comments and suggestion for the word "can". In next sentence. (11)

Pg.1, para. 3, sentence 11: add: "wilderness". (11)P

Pg.1. para. 4, sentence eight: Suggest adding medusahead (more on medusahead later) (11)

Pg.6, para 4, last sentence: "... ineffectiveness of treatments...". Many of the treatments were effective. Suggest: inserting "level" before "of treatments". (11)

Pg125, Para3, sentence one, suggest removing the first two words: "just as", because that can imply a similar scale of effect from the invasive plants as the herbicide, i.e. the effects are not the same. For example, invasive plants multiple and expand over time. Herbicides effect does not. (11)

RESPONSE: Some clarifications have been made

45. COMMENT: Pg140, Para 4. Suggest adding Fuels Reduction and Road Maintenance to the list. (11)

Pg 141, Para 3, line 6: Suggest inserting "rapid" between "continued" and "spread". (10-12% increase per year on untreated infestations is exponential and rapid) (11)

Pg143, Para2, last sentence: After "fires" insert "result in increased invasive plant infestations and altered ".... native plant communities (11)

Pg143, Last para, line 8, replace "very small" with the actual percentage as quoted elsewhere in this EIS. (11)

Pg143, Last para, and last sentence: "vegetation management", should that be "Integrated Weed Management"? (11)

Pg150, First para, line one, insert "rapidly" after "spread". (11)

Pg194, Para5, last sentence, after "increase", insert "within and beyond" these areas. (11)

Pg358, Para1, line 2, replace "may" with "frequently". Line 4, replace "threaten" with "damage or degrade" (11)

Pg368, Para6, line6, this sentence understates the conditions on the ground. Suggest replacing "may" with "frequently or often"; replace "threaten" with "damage, or degrade, or reduce". "Threaten" implies something might happen. Whereas it is definitely happening and increasing. (11)

Pg404, Para3, First sentence: suggest replace "threaten" with either "degrading or damaging" (11)

pg420, Para5, last sentence: suggest replace "could" with "would" (or if you have to "most likely"). Does anyone doubt that the weeds will continue to spread? (11)

RESPONSE: Some clarifications have been made

46. COMMENT: Pg77, para 3, line1, reference to "increased cost". Is the increased cost usually negligible or often substantial or everything in between? Whatever it is - suggest adding more information so the reader has some information to evaluate this alternative. And suggest something be added about the effect of increased cost. Until such time as a comprehensive Invasive Plant Management effort is fully funded, doesn't increased cost mean less preventative work and less EDDR and periodic inventories? Thus allowing more weed spread? Until comprehensive invasive plant management effort in the HCNRA is fully funded- which may be a long time, if extra funds are used on these sites for nonhelicopter application, that must mean that some of the other critical invasive plant work like prevention, EDDR, and priority control work on other sites will not occur. And, that means more weed spread from those untreated sites- which means more impact on nontarget vegetation and wildlife which is the very resource helicopter opponents are trying to minimize. (11)

RESPONSE: text edited to state likely connection between increased cost and fewer acres treated. Reader refered to cost comparison table.

47. COMMENT: Pg94, para4, line 8, "periodic monitoring"? Isn't "annual inventory and mapping efforts" the appropriate terms as used in last para pg. 109 – inventory is used elsewhere in this EIS also.(11)

RESPONSE: Sentence added to this paragraph: Monitoring in this context means the same thing as inventory used elsewhere in this document.

48. COMMENT: Pg 96, para4, "Manual and mechanical methods as primary methods prior to the use of herbicides were shown to be only 25 percent effective on the Umatilla National Forest located adjacent to the Wallowa-Whitman National Forest (Erickson 2006)." is confusing. (11)

RESPONSE: FEIS Edited to read: Erickson (2006) reported that on the Umatilla National Forest, manual and mechanical efforts were about 25 percent effective when used as the primary treatment method.

49. COMMENT Pg 136, Para3, suggests saying something like: Effective control would be expected with herbicides. Another option is biological control however, at best that would allow yellow starthistle to continue to produce seed which would allow this invasive plant to spread farther and farther from this site for many years to come. Bio-control efforts usually leave enough plants able to produce seed and thus the weed spreads from the site. (11)

RESPONSE: Correction made

50 COMMENT: Pg183, para1, line4, "leaving stream corridors untreated", doesn't that allow weeds to produce seed and spread nearby and far way which negatively impacts wildlife? (11)

RESPONSE: This edited to read: In addition, the PDFs have been set up to provide layers of caution so that even if the exact locations are not known, the potential for adverse effects are minimized. The limitation on treatment type (limited herbicide use), and the addition of PDFs, buffers and treatment caps all work together to provide sideboards to deal with the uncertainty of treating new sites. The PDFs were developed considering the range of possible treatment methods applied to the range of site conditions found across the Wallowa-Whitman National Forest.

51. COMMENT: Pg187, Para5, last sentence, is "killing" the best term to use. While accurate it may be sort of inflammatory. Do we say we "kill trees", or harvest them? Perhaps killing could be replaced with "controlled" (and elsewhere in the EIS). Pg.1, para. 3, first sentence: after "protect" suggest inserting: "and improve". (11)

RESPONSE: Edits made

52. COMMENT: The charts are unreadable on pages 113, 114, 146 and 149. Typo on page 326 refers to Willowa-Whitman. (2)

RESPONSE: "Willowa" typos corrected

53. COMMENT: On page 11 we did not see Goal 2 and on page 128 we are not sure what weed is blackgrass? (25)

RESPONSE: Goal 2 is related to invasive plant prevention rather than treatment so was not included in the section on relevant management direction for treatments. Blackgrass (*Alopecuris myosuroides*) is slender meadow foxtail...

EDRR

54. COMMENT: The addition of an instrument enabling designation of additional aerial treatment sites, as proposed sites are successfully treated and restored, would be invaluable. (19)

RESPONSE: See response to comment # 10.

55. COMMENT: Early Detection Rapid Response (EDRR) for new sites is a particularly important tool; without EDRR, new sites may go untreated and expand exponentially until such time as treatment is authorized. Delay of treatment dramatically increases the risk of resource degradation, as well as exponentially increasing treatment and restoration costs. (19)

RESPONSE: Support of EDRR acknowledged.

56. COMMENT: No use of "future" chemicals or herbicide use on unknown "future" sites without site-specific analysis and public disclosure. (21)

RESPONSE: The EDRR analysis approach is based on the premise that similar treatments on similar sites will have similar impacts. The effects of treating approximately 8,000 acres per year are disclosed in the EIS. The PDFs and buffers predict and minimize risk. The EIS limits what newly discovered infestations could be treated under EDRR. For example, a newly discovered invasive infestation of emergent vegetation could not be treated under this EIS because this EIS doesn't include the treatment of invasive emergent vegetation. So the same exclusions, limitations, and safeguards developed for currently known sites would be in place when considering treatment of invasive sites discovered in the future.

56. COMMENT: You can't allow blanket treatment of unknown sites with no site-specific analysis (21)

RESPONSE: None of the alternatives "allow blanket treatment...without site-specific analysis." The DEIS described the types of treatments considered for identified sites, and the resource issues associated with each site along with project design features used to resolve resource conflicts. Treatment methods have been analyzed using the design features and have been shown to be effective in reducing impacts to the various resource of concerns. The direct, indirect and cumulative effects of treating invasive plants have been disclosed. The implementation planning

process would identify the type of treatment and resources of concern so that proper protection measures would be implemented. Individuals and communities will be notified prior to treatment and treatment areas would be posted so the public is informed.

Education

57. COMMENT: Education should be a key component to weed prevention and we ask that the DEIS make specific plans for outreach for public participation in weed prevention and eradication efforts. (14)

RESPONSE: No further response in FEIS. This is already a Forest Plan objective and is outside the scope of this project. This is not a connected action because this would not lead to eradication, control or containment of more than 20,000 acres of invasive plants. Education has independent utility regardless of the alternative selected for this project. This project is tiered to the R6 2005 FEIS which included discussions about public education.

Favor Alternative B (no response necessary)

58. COMMENT I am in full support of Alternative B, the proposed action as the only alternative that has a real chance of accomplishing the objectives you have set out to accomplish. Broadcast treatment in riparian areas and aerial treatment options are critical components to having a successful program. (12)

60. COMMENT: ODFW supports Proposed Action- Alternative B. Alternative B would provide the WWNF with the tools it needs to effectively treat invasive plant populations. Under Alternative B, the WWNF would have the ability to use chemical, physical, biological, cultural and Early Detection/Rapid Response treatments. The broader list of herbicides and aerial herbicide application in designated areas will improve treatment effectiveness and success. We would also like to encourage the WWNF to consider adding some flexibility in designating additional areas for aerial treatment. ODFW believes that Alternative B will substantially improve the control and eradication of invasive plants, thus improving fish and wildlife habitats and overall forest health. Thank you for an opportunity to comment on controlling invasive plants. (13)

61. COMMENT: Of the alternatives proposed in the DEIS, Idaho Power prefers alternative B (the preferred alternative). While the preferred alternative represents a significant improvement over the current invasive plant treatment options available on the Forest, Idaho Power has concluded that the preferred alternative, and the other alternatives proposed in the DEIS, do not represent feasible or effective plans for managing noxious weed population at either the site or landscape level, primarily because of the administrative restrictions and bureaucratic processes and timeframes required. (17

62. COMMENT: After reviewing the DEIS and having worked with weeds for 40 years, I know you need everything available to get the job done. I support Alternative B. (18)

63. COMMENT: The availability of aerial treatment of identified sites in the Proposed Action Alternative is essential to the overall integrity of the program. With the technology available today, aerial application of herbicide is extremely precise and cost effective. The sites proposed for aerial treatment are extremely remote and could pose considerable safety risk to persons attempting ground application in these areas. Also, treatment per acre cost, in this rugged country, may increase threefold or more if ground application is the only available alternative. (19) 64. COMMENT: Alternative B allows broadcast application in riparian areas, and we fully recognize the need for this tool. Several species of noxious weeds tend to flourish in riparian areas, and on many known sites they have formed dense monocultures due to lack of viable treatment options on the Forest. We realize that this option will be exercised, for the most part, through hand broadcast application using backpack sprayers. However there are limited situations where broadcast herbicide treatments in riparian areas must be performed using ATVs, to maximize efficiency. (19)

65. COMMENT: As chairman of Upper Burnt River Weed Control District, I thank you for the opportunity to comment on the Wallowa-Whitman National Forest Draft EIS for Invasive Plant Treatment. Our weed management area favors 'Alternative B' as the best choice by far over the alternatives, and we look forward to better partnering with Wallowa-Whitman Coke Ramos National Forest in noxious weed control in our area. (20)

66. COMMENT: I am writing to support Alternative B of the Draft EIS. My participation with weed issues across the forest for thirty years leads me to the conclusion that more control emphasis is needed and Alternative B is the best choice. (6)

67. COMMENT: Alternative B, the proposed alternative, is the only one that shows a chance of perhaps decreasing the amount of infested acreage. (7)

68: COMMENT: The Tri County Cooperative Weed Management Area (CWMA) would like to thank you and your team of specialists for the opportunity to comment on the Wallowa-Whitman National Forest Draft EIS for the Invasive Plant Treatment Project. It is our opinion that this is a well written document which addresses a host of very important issues with clarity, precision and accuracy. We fully support the Proposed Action Alternative, Alternative B. The ongoing partnership between federal, state, and local agencies, as well as private individuals in this battle against invasive species in northeast Oregon continues to be highly successful and sets an example for noxious weed management throughout the nation. It is our opinion that all partners should, at a minimum, possess the tools available in the Proposed Action Alternative, Alternative B. (9)

69. COMMENT: Alternative B should be adopted and will best respond to the urgent invasive nature of noxious weed expansion into public lands. I would trust that the personnel in decision making capacities would have the expertise necessary to best apply cost-effective and environmentally safe practices. This would include the use of herbicides as per label requirements, specific to riparian areas, and broadcast in the most practical means to address specific conditions. (10)

70. COMMENT: Our weed board strongly supports Alternative B. (10)

71. COMMENT: We fully support the Proposed Action Alternative, Alternative B, as the only logical choice given the four alternatives. It is imperative that the Wallowa-Whitman National Forest have at their disposal all of the tools proposed in this alternative. The availability of the tools provided through Proposed Action Alternative, Alternative B, for invasive plant management on the Wallowa-Whitman National Forest are not only critical with regard to the Forest, but are also extremely important to noxious weed control throughout northeast Oregon. Weeds do not recognize political or jurisdictional boundaries, and must be dealt with on a landscape scale. The ongoing partnership between federal, state, and local agencies, as well as private individuals in this battle against invasive species in northeast Oregon continues to be highly successful and sets an example for noxious weed management throughout the nation. It is our opinion that all partners should, at a minimum, possess the tools available in the Proposed Action Alternative, Alternative B. (19)

72. COMMENT: The eight new chemicals made available for use on the Forest, in the Proposed ActionAlternative, will increase effectiveness on noxious weeds while limiting off-target damage and decreasing potential human safety hazards. Several of the most invasive and aggressive weed species presently infesting the Forest are uncontrollable without these newly available herbicides. Of the four alternatives, the Proposed Action Alternative bears the lowest cost per acre; when spending taxpayer funds it is essential to accomplish goals efficiently and effectively. (19)

73. COMMENT: We feel strongly that the proposed action, Alternative B, uses all the tools more effectively than the other alternatives. When applicators are careful and follow the label, hand broadcasting is the most affordable and effective method in riparian areas. Aerial applications are essential for accomplishing landscape weed management in steep, rugged terrain. The John Day/Snake RAC remains ready to assist in this process. Thank you for the opportunity to comment and to support Alternative B. (25)

Favors Alternative C

74. COMMENT: Herbicide should not be sprayed in amphibian habitat. Herbicide should not be broadcast sprayed in riparian areas as defined in the glossary. Reference is made to the definition of "broadcast application" in the DEIS Glossary on page 430. (14)

RESPONSE: In the "Invasive Plants and Wildlife" topic of section 3.3.2 establishes the importance of native plant habitat for amphibians. For those habitats infested by invasive weeds it is important to to kill invasives and reestablish native vegetation habitat. Herbicide applications to accomplish this are limited based on the buffers in Tables 7,8 and 9, and PDFs H-8 and J4a. Further PDF A-1 establishes a process to insure site inspections and incorporating appropriate protective measures, if needed, before herbicide applications.

75. COMMENT: Because broadcast and aerial spray of herbicides have potentially higher risks of contaminating waterways, the FS should select an Alternative that limits or excludes use of these techniques in applying herbicides around waterways and other sensitive resources. (15)

RESPONSE: Alternatives B, C and D adequately minimize potential risks through buffers, common control measures and PDFs detailed in chapter 2. It is acknowledged that Alternative C would further minimize risk by disallowing broadcast spraying in riparian areas and Alternative D would minimize aerial herbicide drift by disallowing aerial herbicide treatments.

76. COMMENT: No broadcast spray in riparian or amphibian habitat. (8)

RESPONSE: This is Alternative C. Alternative B includes buffers that achieve the same result of minimizing risk but allowing for more flexibility with some herbicides that have toxicity.

Fisheries

77. COMMENT: We are very concerned about the population trends for Snake River sockeye salmon and potential effects of herbicide use in riparian areas. (21)

RESPONSE: Section 3.5.2 discusses the Snake River sockeye salmon including its endangered status. Section 3.5.3 covers concerns regarding possible effects from herbicide applications and concludes that because of the project design features (PDFs) (mainly H-1 through H-13, and the buffers protecting water bodies from direct herbicide contact (see Tables 7-9), the likelihood herbicide contact and detrimental effects is extremely remote. An accidental spill is the greatest possibility of a concentration of chemicals entering a water body. Again, PDFs, in particular H-12, specifically help minimize the possibility of a spill. For more specific information on potential environmental consequences see Tables 55 and 56, and the topic "Probability of Herbicide Exposure" in Section 3.5.3.

78. COMMENT: Table 56 shows high HQ values for some aquatic species groups. This causes us great concern. (21)

RESPONSE: These values are for nationwide typical and maximum applications. PDFs minimize effects. PDFs H1 through10 and H-12, 13 specifically lower potential of chemical contact with water bodies and/or aquatic species groups.

79. COMMENT: No spot application of imazapyr or glyphosate (even aquatic label) within 15 feet of standing water. (21)

RESPONSE: There are cases where more selective treatments are not adequate and spot treatments are necessary to treat patches of invasives. The PDFs minimize effects based on herbicide properties and potential risk.

80. COMMENT: We disagree that it is ok for the quality of EFH for salmon to be reduced, thus no aerial spraying with picloram. (21)

RESPONSE: EFH is also threatened by invasive plants, aerial buffer a minimum of 300 feet (PDF 8c) minimize potential for herbicides to enter water bodies. Aerial applications of picloram would not exceed .25 lb a.i./ac., and the other PDFs (F8a-F8o) provide sufficient protection of EFH for salmon.

Funding

81. COMMENT: The successful implementation of the tools laid out in the Region 6 Preventing and Managing Invasive Plants Record of Decision is one of the most critical programs necessary for the protection of ecosystem health. We are aware of the challenges to the USFS as you work towards effective management of noxious weeds while being hindered by the mitigated agreement, lawsuits, and dwindling budgets. We appreciate the difficult process the Wallowa-Whitman NF performed while drafting this document. Again we would like to stress the importance of stable funding to assure success of this program. (25)

RESPONSE: Acknowledge the funding support.

82. COMMENT: Another major concern is that the Table on page 25, Alternatives at a Glance, indicates that only one third of the known weed sites will be treated each year. We feel that not enough area will be treated annually and it is unclear how these treated sites will be prioritized. If only a third of the sites are treated each year, the Forest will never start gaining on noxious weed control. If all known Forest weed populations cannot be treated every year, then sites will need to be prioritized. High priority sites may be outlier populations, sites with higher rates of spread, or treating the boundaries of larger infestations. Criteria for prioritization should be established up front and in consultation with your partners. (25)

RESPONSE: Edit FEIS to note that not all acres of treatment are for eradication; containment strategies may treat the outer edges, so that treating a third of the infested acres may meet need in some cases. Priority has been addressed: DEIS P8 - Treatment priority is based on the historic investments made to control the species, its invasive nature, its location and whether it is a new species on the Forest. New species of invasive plant or a new invasive plant infestation may demand an immediate response using Early Detection, Rapid Response strategy. P 22 - Each invasive plant site in the inventory was assigned a primary treatment method (e.g. chemical,

biological), a priority for treatment (1 through 5), and a control strategy (e.g. eradicate, contain). Areas to be treated annually and treatment strategies will be coordinated with partners as stated in 2.2.3 in the topic entitled, "Annual Implementation Planning".

General

83. COMMENT: Another concern we have is, as more and more areas are closed off, how will monitoring/scouting be done to find new infestations, and how will old infestations be treated? (20)

RESPONSE: Area closures would reduce the vector and could be treated, albeit more expensive. Road closure projects to consider effects. Program monitoring will determine retreatment needs of sites previously treated. Annual priorities for treatment, including retreatment, will be set by each District working with cooperators.

84. COMMENT: Page 90 states that closing roads will reduce spread of invasive plants, it will actually increase them by making them inaccessible for treatment. (2)

RESPONSE: Closing roads may be done in conjunction with treating for invasives, closing roads reduces spread by eliminating the potential for vehicles to spread weeds far distances, which is why roads are an important vector.

85. COMMENT: There should be more emphasis on nonchemical control and passive restoration (including revegetation with native plants, decommissioning roads, and public education). Campgrounds and other areas should not be subject to repeated and futile herbicide poison dumping. (21)

RESPONSE: Nonchemical methods and restoration would be approved and used as needed and effective. No herbicide dumping is proposed. Road decommisioning and public education are important. They are managed under existing programs separate from this EIS and is therefore not a connected action. Clarification has been added to the Purpose and Need section of Chapter 1.

86. COMMENT: We ask for more than 100 foot buffers for sensitive native plants and riparian areas as models often fail to calculate the effects of erosion, surface water runoff, wind, etc. (21)

RESPONSE: Buffers are based on application methods and herbicide properties. 100 foot buffers not necessary for all situations. GLEAMS model considers erosion and runoff, AGDisp model considers wind,

87. COMMENT: Avoid using triclopyr and picloram and use sulfonylurea herbicides very sparingly. Do not use roundup as it is much more toxic than rodeo. (21)

RESPONSE: These herbicides are necessary to treat the range of situations known on the W-W NF. Picloram is listed as an effective herbicide for 91 percent of the target species, triclopyr for 15 percent of the target species, and sulfonylurea herbicides for about 50 percent of the target species.

88. COMMENT: Integrated weed management does not mean using herbicides with other methods. Many small and first detected invasive plant populations can be controlled by methods other than herbicides without losing effectiveness. (21)

RESPONSE: Integrated weed management strives to achieve optimum management goals and objectives in coordination with other resource management activities. The potential for effectiveness is increased when the broadest range of tools are available so that the optimum combination of methods can be applied. Many target species cannot be effectively controlled

using manual methods only (see Common Control Measures). Where nonchemical control methods are determined to be efficient and effective they will be used.

89. COMMENT: The assessment of adverse effects that cannot be avoided is insufficient. Botanical SOLI, not just common plants, may be harmed. Effects on soils are not adequately addressed. Should acknowledge some of these effects would be avoided if herbicides were not used (21)

RESPONSE: The effects are adequately discussed in the Environmental Consequences of Botanicals (section 3.2.3) and soils (section 3.4.3). Invasive plant sites with excessively well-drained soils has been identified and further restrictions on some herbicides has been added in section 3.4 and Appendix D.

90. COMMENT: Herbicides appear easy and cheap now, but is not treating the cause of the problem and the environmental bears the cost. (21)

RESPONSE: The R6 2005 FEIS explains that both treatment and prevention of the causes of invasive plant spread are important components of the program. While these components are related, treatment of invasives is needed regardless of prevention measures taken. Prevention measures are applied during project planning for ground disturbing activities and are not connected actions to this proposal. Herbicide use in this project is likely to be neither easy nor cheap, but is intended to be effective while minimizing potential for adverse effects from treatment.

91. COMMENT: FS should pick the most environmentally protective alternative which is not poisoning the land eg the most protective alternative would use toxins only as a last resort or not at all. (21)

RESPONSE: The environmentally preferred alternative has been identified as Alternative B because it includes the widest range of effective treatments while minimizing adverse impacts. It is imperative to look at the overall effect of each alternative when selecting an environmentally preferred alternative. The desired outcome of this project is for native plant ecosystems to function naturally without being modified or functionally compromised by nonnative invasive species. Because invasive plants, when left unchecked, are aggressive and can often out-compete native vegetation, they threaten the natural systems supported by native plant populations. The potential impact of invasive plants, therefore, far outweighs the potential risk from herbicide use in Alternative B.

Furthermore, the precautions elaborated for this Alternative in Section 2.2.3 sufficiently protect humans and the natural environment from possible toxic contamination that may be of concern.

92. COMMENT: We hereby incorporate by reference the entirety of our comments and administrative appeal submitted regarding the Region 6 2005 FEIS on invasive plant management. (21)

RESPONSE: The comment does not state which concerns were not resolved in the appeal of the regional document. The R6 2005 ROD was affirmed after a "deliberative and extensive review process." (August 15, 2006 Appeal Decision, http://www.fs.fed.us/emc/applit/includes/woappdec/r6 ipp decision.pdf.).

Hazard Trees

93. COMMENT: Keep workers who are conducted plant treatments out of areas that have hazardous trees and snags that may pose a safety hazard. If you can't make that promise, please disclose the cumulative impacts of lost snag habitat across thousands of acres and surrounding hazard zones. (8)

RESPONSE: Though snag removal is not part of the invasive plant treatment proposal, every year a project work plan for herbicide use as described in FSH 2109.14.3 will be developed. Work plans will include a job hazard analysis to assure applicator safety (see the "Annual Implementation Planning: top of section 2.2.3 of the EIS).

Herbicides

94. COMMENT: The Forest Service must make a specific measurable commitment to reducing reliance on herbicides. (14)

Response: As stated several places in the EIS, the Forest Service desires and expects herbicide use to decline over time if effective treatments are implemented. Treatments will be followed by either active or passive restoration, and the restoration would be monitored over time. The restoration is aimed at establishing native plant communities, which would reduce the need to use herbicides over time. Treatment of invasive source populations and implementing the planned Early Detection Rapid Response plan would also serve to reduce long-term herbicide use. To measure progress toward the goal of herbicide use reduction the Forest Service will keep records of where, how much and what herbicides are used and this information will be entered into the FACTS database. This is stated in the "Annual Implementation Planning" topic of section 2.2.3. This section has been edited to acknowledge that one of the purposes of monitoring and recording this information is to determine if the goal of reducing reliance on herbicides over time is achieved.

95. COMMENT: Establish clear measurable standards to implement the goal of reduced herbicide use over time. (8)

RESPONSE: As stated several places in the EIS, the Forest Service desires and expects herbicide use to decline over time if effective treatments are implemented. Treatments will be followed by either active or passive restoration, and the restoration would be monitored over time. The restoration is aimed at establishing native plant communities, which would reduce and eliminate the need to use herbicides over time. Treatment of invasive source populations and implementing the planned Early Detection Rapid Response plan would also serve to reduce long-term herbicide use. To measure progress toward the goal of herbicide use reduction the Forest Service will keep records of where, how much and what herbicides are used and this information will be entered into the FACTS database. This is stated in the "Annual Implementation Planning" topic of section 2.2.3. This section has been edited to acknowledge that one of the purposes of monitoring and recording this information is to determine if the goal of reducing reliance on herbicides over time is achieved.

96. COMMENT: The Forest Service should fully disclose the environmental impacts of the so-called "inert" ingredients in the herbicide formulations they proposed to use. For all we know these herbicide companies are laundering hazardous waste through the inert ingredient stream. Inert ingredients are a huge blind-spot in the decision-making process which violates the letter and spirit of NEPA's mandate for full-disclosure and informed decision-making. (8)

RESPONSE: Inerts are part of the SERA risk assessments done for the chemical formulations approved. The R6 2005 FEIS Appendix G gives electronic link to full text of the risk assessments. Section 5.1.2 of Appendix Q of the R6 2005 FEIS explains the process whereby inerts human health risks are analyzed.

Human Health

97. COMMENT: Since there are no studies about effects of herbicide on edible mushrooms then all herbicide use should be avoided in mushroom gathering areas. Do not use herbicides that concentrate in the soil and avoid effects on mycorrhizae. (21)

RESPONSE: Effects on edible mushrooms are discussed in section 3.2.3 of this EIS. The effects of herbicides on soil biology are reported in section 3.4.3. In part it reads, "To protect soil organisms and therefore protect soil productivity, sulfometuron methyl would only be used once a year at any specific site to avoid accumulating herbicides in the soils. Picloram could only be used once every two years to protect soil productivity and avoid accumulation in the soils of this persistent herbicide."

Implementation

98. COMMENT: More clarification is needed regarding when treatment plans will be required in riparian areas. What information should be included in permit applications? What are the processing timelines? What are the decision criteria to determine if a proposed project moves forward? (17)

RESPONSE: Annual implementation plans will be required for all areas including riparian. They will be done on the local District level incooperation with cooperators. This information is presented in the topic "Annual Implementation Planning" in section 2.2.3. Decision criteria for the overall project which will authorize the treatments described herein are discussed in section 1.6. Annual project planning will follow "Integrated Weed Management principles (R6 2005 FEIS, 3-3) and satisfies pesticide planning requirements at FSH 2109.14" (see "Annual Implementation Planning" topic in section 2.2.3). Further detailed planning will be done at the local District level and is beyond the scope of this document.

99. COMMENT: Aerial application of herbicides over the company's power lines may potentially exacerbate contamination of the insulators, which may lead to faults. The company would appreciate being consulted when such projects are planned. (17)

RESPONSE: In the known aerial sites there are no power lines that would be sprayed over.

100. COMMENT: The Draft EIS proposes an Annual Implementation Planning protocol (pg. 75). This protocol is elaborate, overly bureaucratic, and will pose a major impediment to implement projects in a timely manner. It will take one field season to collect all data required to assess treatment sites, produce the required reports and approval for these spraying projects that could potentially be implemented the following year. This would double the length of the project. The Forest fails to consider that one-time treatments may not be effective in eradicating, controlling, or containing noxious weed populations (sites). Based on the implementation protocol proposed, the company would anticipate having to navigate an overly burdensome bureaucratic process in order to treat a site. Our review of the process suggests that it would require about 20 steps or actions prior to on-the-ground treatment occurring. This process provides a disincentive to cooperation and good-will treatment of invasive species sites among nonagency landowners and organizations. given the cumbersome planning protocol proposed by the Forest, the EDRR is likely to fail, because of lag time required by planning protocol. (17)

RESPONSE: The Implementation Planning protocol described on page 75 is our attempt to outline how treatments would be determined, how PDFs will be applied, and how work will be implemented. Because this EIS analyzes the effects of treatment across the entire W-W National Forest, the range of situations is variable. The PDFs and Implementation Planning process cover the wide range of situations and demonstrate the care that would be taken to ensure that treatments

are within the scope of this analysis. Many of the steps of the protocol have already been completed for the known sites. The Forest Service is committed to working with partners to Insure that planning and implementation occur in the same year; including for EDRR sites.

101. COMMENT: The company suggests that the FEIS should discuss how the Forest will coordinate invasive plant treatments conducted by "special use" permittees. (17)

RESPONSE: In the Annual Implementation Planning topic of section 2.2.3, coordination is ensured between the Forest Service and cooperators such as Idaho Power. Special use invasive plant treatment permits held by cooperators will be brought into compliance with this EIS either by amendment or renewal of the permit.

102. COMMENT: Although this purports to be a site-specific EIS, we think it would be advisable to create a more detailed site-level plan for each treatment area and allow for public comment before implementation. (8)

RESPONSE: The "Annual Implementation Planning" topic is in Section 2.2.3 which details how treatment of sites will be planned. Each District will identify which sites it intends to treat and put together an implementation plan. With over 1700 known treatment sites it is infeasible and unnecessary to include a public comment process for each site. It is unnecessary because the effects of treatment given the array of invasive plants, treatment sites, treatment methods and herbicides available are fully disclosed in this document. Treatment site types and scenarios outside what have been described and analyzed are not anticipated.

103. COMMENT: One of the greatest concerns after reading the document is whether a weed manager following all the standards and Project Design Features (PDFs) will be able to treat weeds in a timely manner. If the goal is to "protect ecosystems from the impacts of invasive plants through an integrated approach that emphasizes prevention, early detection, and early treatment," a manager must be able to move quickly from discovery to treatment. (25)

RESPONSE: The Implementation Planning protocol described on page 75 is our attempt to outline how treatments would be determined, how PDFs will be applied, and how work will be implemented. Because this EIS analyzes the effects of treatment across the entire W-W National Forest, the range of situations is variable. The PDFs and Implementation Planning process cover the wide range of situations and demonstrate the care that would be taken to ensure that treatments are within the scope of this analysis. Many of the steps of the protocol have already been completed for the known sites. The Forest Service is committed to working with partners to Insure that planning and implementation occur in the same year; including for EDRR sites.

Monitoring

104. COMMENT: Monitoring should incorporate following elements:

- Density and rate of weed spread and their effects.
- Effects of herbicides on noxious weeds and nontarget plant mortality.
- Establishment and effectiveness of biological control agents.
- Presence of herbicide in surface or ground water in high risk areas (i.e. accidental spills, aerial application).
- Overall, results of the proposed treatments in terms of their effectiveness of control and environmental consequences, and in meeting the goals of the 1964 Wilderness Act. Almost 1,000 acres of invasive weeds are within wilderness areas (p. 359). (15)

- RESPONSE: Treatment using herbicides would follow EPA labeled restrictions for use. Beyond the labeled requirements of use, this FEIS details many additional precautions and restrictions that further protect the environment. The specifics that address the monitoring you suggested are as follows. Density and rate of spread of weeds is reported in the FEIS Section 3.2.2 and Table 19 which shows the gross and estimated net acres of weed density. Discussion of herbicides and biocontrol agents including effects are in Section 3.2.3. The project does not assume herbicides will be present in surface or groundwater. Rather to prevent such eventuations, project design features (Section 2.2.3) for water bodies (PDFs H-1 through 13) including spills (PDFs G &H-12), buffers (Tables 7-9) and PDFs for aerial applications (f-8a through F-8o) have been included. Further, Appendix D includes weed sites located on excessively well drained soils. Herbicides useable on these sites is limited to prevent active, toxic ingredients from entering ground water (Common Control Measures (Table 5) in Section 2.2.3. To meet wilderness goals there is the Minimum Requirements Decision Guide in Appendix A. Please consult that Appendix.
- While much of your concern should be addressed by the above sections listed for the EIS, here are some monitoring requirements that will be part of the implementation plan. These are found in Section 2.2.3:
- Post-treatment reviews would occur on a sample basis or when required by a Project Design Feature to determine whether treatments were effective, if damage to nontarget species occurred, or whether or not passive restoration occurred as expected.
- Post-treatment monitoring would also be used to detect whether Project Design Features were appropriately applied and effective. Contract administration and other existing mechanisms would be used to correct deficiencies.
- Additional monitoring may be done consistent with the R6 2005 ROD.

New Herbicides

105. COMMENT: The list of acceptable herbicides is reasonable to treat most weed species present on the Forest. Milestone® is not included on this list; it is an effective treatment option for knapweeds and thistles, it is not a restricted herbicide, and has less soil residual properties than Tordon®. (17)

RESPONSE: Though Milestone is recognized as a safe, effective herbicide, the suite of chemicals and herbicides allowable under this EIS is also safe and effective. Because this EIS was drafted before Milestone's Forest Service risk assessment was completed, it was decided not to add it under this action and further delay the completion of the FEIS, but instead to possibly add it later under a supplemental or separate NEPA document.

106 COMMENT: The ability to add new herbicides as they become available (i.e. Milestone - active ingredient aminopyralid) would be a valuable addition to this alternative [B]. Milestone has proven to be much more effective on particular species, and increases the treatment window thereby increasing chances of success. (19)

RESPONSE: Though Milestone is recognized as a safe, effective herbicide, the suite of chemicals and herbicides allowable under this EIS is also safe and effective. Because this EIS was drafted when Milestone was approved, it was decided not to add it under this action and further delay the completion of the FEIS, but instead to add it later under a supplemental or separate NEPA document.

107. COMMENT: It is good to see the addition of eight (8) chemicals that will be available for use to you. However, one thing that concerns us is no provision for new chemicals to be brought on board.

It would just seem like good sense to us to put in place a set of criteria that new chemicals would need to meet before being used. When said criteria is met, the new chemicals could be used without having to repeat this process while years go by and noxious weed spread is unchecked. (20)

RESPONSE: Future new chemicals have unknown chemical formulations and uncertain effects, therefore it would be inappropriate to speculate on effects until the chemicals are known; at which time they can be added under an EIS amendment or separate NEPA.

108. COMMENT: No herbicides approved after 2004 are considered – the EIS should consider new herbicides such as Cimarron Max by DuPont. The EIS should include the possibility it may be amended to use new herbicides to respond to climate change. (2)

RESPONSE: The R6 2005 ROD allows for consideration of new herbicides and this EIS may be amended over time to include new herbicides, especially if they are shown to increase cost-effectiveness or reduce potential risk assessments. NEPA Regulations allow for changes to proposed actions and this would be followed. For instance, aminopyralid (milestone) shows promise as a lower risk herbicide that may be equally or more effective for broadleaf invasive control. Cimarron Max is a DuPont product which contains a mix of metsulfuron methyl with 2-4 D and dicamba. Because the 2005 FEIS/ROD found that dicamba presented too many situations where effects might be too great (HQs greater than 1), it was not approved use and likely not be approved even with additional site-specific NEPA. since these herbicides were specifically not approved in 2005.

109. COMMENT: Recruiting new, more effective and safe herbicides as they become available (i.e. Milestone, active ingredient aminopyralid) would be a valuable addition to this alternative. Milestone has proven to be much more effective on particular species, and increases the treatment window thereby increasing chances of success. (9)

RESPONSE: Though adding new safe, effective herbicides such as Milestone would likely be beneficial, the suite of chemicals and herbicides allowable under this EIS is also safe and effective. Because this EIS was drafted when Milestone was approved, it was decided not to add it under this action and further delay the completion of the FEIS, but instead to add it later under a supplemental or separate NEPA document.

No Action

110. COMMENT: There is no analysis of why the current program described under No Action has not been effective. It is more likely to be because of mistakes, lack of thoroughness, and/or lack of prevention of the root causes of invasive plant spread rather than lack of effective herbicides. Absence of a prevention program was key to the failure to contain invasive plant spread, rather than it being due to less dumping of herbicides on the land. (21)

RESPONSE: The R6 2005 FEIS addressed the need for emphasis on prevention as well as increased treatment options, including EDRR. This project would allow for more treatment options in a quicker time frame than No Action. Discussion of effectiveness of previous control efforts are in Section 1.1 page 6.

Not in Favor No Action

111. COMMENT: I am in favor of any alternative except A. (1)

RESPONSE: Preference noted.

Not in Favor of Alternative C

112. COMMENT: The restriction on possible riparian treatments in alt. C would reduce to effectively nothing the ability to attack large Knotweed and blackberry stands and to halt Common bugloss encroachment into McFarlane 4"O-clock habitat on the lower Imnaha by way of the river bars. Blackberry is becoming a serious issue among some weed professionals in Eastern Oregon. I submit that it will be a far larger problem than in Western Oregon if only because our riparian areas are such an important part of our more arid landscape. Virtually every Hells Canyon creek supports blackberry at some level, just waiting for the next fire to open up the riparian area for more blackberry. (7)

RESPONSE: Preference noted.

PDF

113. COMMENT: The final EIS should identify added precautions that will be used when applying treatments near streams or road ditches that drain in the streams to minimize or avoid drift impacts and sublethal effects to aquatic life. For example, FS should avoid application of Picloram and other herbicides with very high movement rate to water sources within annual flood plains with water table close to the surface and high soil permeability. (15)

RESPONSE: The FEIS includes design features H-1 through H-13 to protect water and aquatic Habitats. H-1 also refers the reader to Tables 7-9 that detail the riparian buffers associated with different chemicals and different bodies of water. H-6 has specific restriction on Picloram. Common Control Measures also include chemical restrictions on certain invasive species depending on the resource conditions at the treatment site.

114. COMMENT: The final EIS should include a discussion on how invasive plants found within buffer zones would be treated and the precautions to be taken to protect water quality and aquatic life. (15)

RESPONSE: Precautions to protect water quality and aquatic life are discussed in sections 3.4 and 3.5. Specific Project Design Features protecting water are PDFs H-1 through H-13 (section 2.2.3) which includes defining buffers for streams and aquatic habitat also listed in Tables 7-9.

Prevention

115. COMMENT: We ask that the Forest Service directly address specific measures to prevent invasive weeds on the National Forest and describe how they will be implemented. We request that the Forest Service incorporate weed prevention, treatment and monitoring into all National Forest program activities. Program activities such as logging, grazing and motorized vehicle use should be modified in order to prevent the spread of invasive weeds and to prevent conditions favorable to their establishment. Given that certain Forest Service projects are treated as categorical exclusions and not analyzed under environmental impact statements, we therefore ask that the National Forest DEIS address invasive plant concerns for categorical exclusion projects. Management activities proposed as categorical exclusion projects should be assessed in light of their effects upon invasive plant prevention. Livestock grazing, logging, and off-road vehicle use should not be allowed near known populations of invasive plants to prevent weed- dispersal from these activities. Invasive weed concerns should be a priority during transportation planning on the Forest. All motorized travel should be limited to designated routes, cross-country motorized use should be eliminated, and unnecessary roads should be closed. Opportunities should be explored to provide washing stations to prevent the spread of weeds by vehicles. We ask that the National Forest will employ a

proactive role in having a forb component in native seed mixtures to accurately reflect the plant communities on the Forest. (14)

RESPONSE: Specific prevention measures have been developed on the Wallowa-Whitman National Forest (See Appendix B).

Prevention activities are not connected actions because treatment is needed regardless of what education, prevention or inventory actions occur. This EIS focuses on the effects of herbicide use in combination with other treatments to eradicate, control, and/or contain existing and new populations.

116. COMMENT: We believe that the Forest Service should require that all feed for horses and livestock is certified as "weed free" throughout all National Forest lands (14)

RESPONSE: This is already required by 2005 Preventing and Managing Invasive Plants ROD Standard 4.

117. COMMENT: We expect that chemical treatment be used as a last resort, and that prevention of the introduction and spread invasive weeds be the primary means of controlling weeds. (8)

RESPONSE: This project is tiered to the R6 2005 FEIS and follows the ROD standards. Herbicide use is proposed to meet the standards. Prevention is a major focus of the R6 2005 FEIS and this project assumes the prevention standards will be followed. The R6 2005 FEIS demonstrated that prevention and effective treatment would both be needed to control invasive plants. This is discussed in the EIS. (also see response to Hells Canyon above)

118. COMMENT: Require "weed free" feed for all stock throughout the forests (not just wilderness). If necessary phase this requirement in so certification programs can become established. (8)

RESPONSE: Already required

119. COMMENT: As a central part of the integrated weed management program, we urge the Forest Service to explicitly consider avoiding and/or limiting activities that increase the risk of invasive species including: (a) activities that disturb soil (e.g. logging, OHVs, livestock grazing, road activities, etc.); (b) activities that open the canopy and increase the availability of light, water, and nutrients for the growth of invasive species (e.g. logging, fuel reduction, brush control); and (c) activities that provide vectors for the spread of weed seeds (e.g. roads, OHVs, logging, grazing). Include clear standards to ensure forest management activities (e.g. logging, grazing, OHVs, roads) do not create conditions conducive to the introduction and spread of weeds. This will by necessity require grazing to be restricted to ensure maintenance of diverse communities of vigorous plants that can best resist invasion by weeds. most of the identified weed sites are located along roads which have chronic soil disturbance, limited canopy of native plants, and chronic seed dispersal vectors. After these treatments, the FS should prioritize closing the roads that pose the greatest problems. (8)

RESPONSE: W-W Prevention guidelines, 2005 FEIS etc

120. COMMENT: You also need to look at your future program of work. Fuel reduction is presents a significant and growing threat of invasive weeds because it creates ideal conditions for weeds - it's a widespread and chronic activity that disturbs soil, increases light and water availability, and increases weed vectors. The same could be said of OHVs. The DEIS fails to incorporate these old, new, and emerging threats into a comprehensive NEPA analysis. [Given global climate change]...we should nevertheless continue to strive to avoid human-induced environmental

modifications that increase the risk of weed spread: soil disturbance, native canopy removal, and seed dispersal vectors. Use concepts of biocomplexity as a tool to prevent invasives (e.g. limit contagious spread of invasive species by avoiding homogeneity). (8)

RESPONSE: Prevention is an important component of invasive plant management. The relationship between prevention of invasive plant introduction, establishment, and spread and invasive plant treatments was discussed at length in the programmatic R6 2005 FEIS. All activities on National Forest System lands are subject to the prevention standards. Because of yours and others comments about prevention, the W-W Prevention Guidelines have been added to Appendix B. Along with the prevention standards they detail how the Forest incorporates prevention into all projects, not just this invasive plants treatment project. Invasive plant prevention practices applied to various land uses are not connected actions with the current project because treatments of invasive plants would be needed regardless of how land uses are adjusted to incorporate invasive plant prevention measures. Prevention standards are being implemented in all projects, regardless of decisions made as a result of this EIS.

121. COMMENT: Limit use of nonessential roads that are high risk vectors for weeds. OHV policy should be "closed unless designated open" starting NOW. (8)

RESPONSE: -OHV policy and road closure policy is part of the Travel Management Program and not this project. Also see response to comment #120.

122. COMMENT: How does this proposal comply with executive order 13112 of February 3, 1999 and Regional Forester Goodman's October 2004 directive regarding prevention of invasive plants? (8)

RESPONSE: W-W Prevention guidelines and 2005 R-6 FEIS prevention standards addresses executive 13112 intention of reducing the spread and influence of invasive plants. Then Regional Forester Goodman's directive spoke of standards that would be added to all Forest Plans to help prevent invasive plant infestations. She also said in the memo, "we need to do more". The 'more' was considering how proposed actions to be done in the national forest might allow encourage weed spread. As stated in comment #120, the Wallowa-Whitman National Forest has prevention guidelines that cover most management activity areas. These guidelines though not written to address the Goodman letter, does properly set weed prevention guides for the Forest. This proposal recognizes the importance of those guidelines but did not contribute to their development..

123. COMMENT: We support keeping OHVs on open system roads to prevent spread of invasive plants. (21)

RESPONSE: Prevention is an important component of invasive plant management. The relationship between prevention of invasive plant introduction, establishment, and spread and invasive plant treatments was discussed at length in the programmatic R6 2005 FEIS. All activities on National Forest System lands are subject to the prevention standards. To meet the standards, prevention practices will be applied to new and ongoing land use projects, including OHV management. Invasive plant prevention practices applied to various land uses are not connected actions with the current project because treatments of invasive plants would be needed regardless of how land uses are adjusted to incorporate invasive plant prevention measures. Prevention standards are being implemented in all projects, regardless of decisions made as a result of this EIS.

124. COMMENT: There should be more emphasis on preventing infestations on roads rather than endlessly, futilely, dumping herbicides. (21)

RESPONSE: See other responses on prevention

125. COMMENT: If you do not establish prevention measures for land uses you will not prevent the introduction and spread of invasive plants, defeating the purpose and need for this plan. The purpose and need cannot be so narrowly defined as to preclude other options or create an overly restricted range of alternatives (21)

RESPONSE: The R6 2005 FEIS explains that both treatment and prevention of the causes of invasive plant spread are important components of the program. While these components are related, treatment of invasives is needed regardless of prevention measures taken. Prevention measures are applied during project planning for ground disturbing activities and are not connected actions to this proposal. Prevention must be considered in all site-specific project assessments as per the R6 2005 ROD. These are not connected actions because treatments of invasive plants would be needed regardless of the site-specific prevention measures taken. The relationship between prevention and treatment was fully explored in the R6 2005 FEIS to which our analysis is tiered. Herbicide use in this project is likely to be neither easy nor cheap, but is intended to be effective while minimizing potential for adverse effects from treatment.

Priority

126. COMMENT: Idaho Power suggests that the Forest consider developing criteria that can be used to prioritize infestation sites and treat the most critical ones first and streamline procedures. A step-down process could be designed to treat second and third priority sites following successful treatment of the first priority sites. Criteria to prioritize sites could be based on the presence of critical important plant and animal species and populations, reversal of impaired ecological services and processes, and various social factors, such as impacts to collectible plant species and welfare of Native Americans. (17)

RESPONSE: Priority is addressed on DEIS page 9: Treatment priority is based on the historic investments made to control the species, its invasive nature, its location and whether it is a new species on the Forest. Page 22: each site was given a priority. Page 26: Each invasive plant site is assigned a treatment priority and strategy based on the invasive plant species and site conditions such as ease of access, land allocation, location near special areas, restrictions due to other sensitive resources, or the invasiveness of a plant in a specific habitat. Sites that are identified as high priority would typically be treated with herbicide.

127. COMMENT: The DEIS states that about 90% of the Forest has been surveyed and 1,740 sites have been identified. Based on Idaho Power's 25% sample of the Snake River corridor below Wallowa-Whitman National Forest Page 2 of 3 April 17, 2009 Hells Canyon Dam to the Salmon River (Krichbaum 2000), this appears to be an underestimation. In this study, Krichbaum found 321 sites; extrapolating this sample across the study area would result in about 1,300 sites just within the Snake River corridor. These data were provided to the Forest in May 2007. If the Forest's estimation of site numbers is underestimated, this will certainly affect the optimistic statements on timeframes and resources required to eradicate, control, and contain invasive plant species contained in the DEIS. The time frames for project completion described in the DEIS are entirely unrealistic. (17)

RESPONSE: The inventory used is a combination of information from past inventories and an inventory completed in 2006. It is acknowledged that not all sites are known. That is why the project EDRR aspect is so important. Due to the passage of time and recognized mobility of weeds we know there are and will be many new sites.

Proposed Action

128. COMMENT: Pg369, Para1, last sentence. I don't understand why such a small acreage is proposed for bio-control. It would appear that, in comparison to herbicide control – even if remote and expensive – bio-control allows the invasive plants to continue producing seed that will infest surrounding areas and beyond. (Probably a good reason for this (only bio-control) but I can't find the explanation). (11)

RESPONSE: We don't characterize this 44-acre site as small. Biocontrol sites will be monitored for effectiveness. If biocontrol agents fail to establish a population or do not achieve a desired level of control, an alternative treatment method may be used.

129. COMMENT: Pg54, F-8a, Lacking any further discussion or rationale for this blanket restriction, it would seem like with EDDR helicopter treatments, effects on nontarget vegetation would be no greater than those treatment areas planned for aerial application in this EIS. In this EIS there are a multitude of precautionary measures and monitoring strategies built into any helicopter treatments that would apply to EDDR as well. With the proposed dramatic rise in treatment activities more people will be out on the ground. These people will be finding many more infestations. For example: infestations of the annual grass medusahead, can become of substantial size before being detected. For larger infestations, helicopter application is more effective, more economical and safer in rugged terrain. Helicopter treatment of EDDR sites, based on a complex set of factors, can sometimes be considerably more cost effective – especially in the rugged- remote terrain of the HCNRA. Using helicopters, with a limited budget, can keep more relatively unifested lands and riparian areas relatively unifested. I include riparian areas because, many invasive plants left unchecked in the uplands make their way into the riparian areas where severe control restrictions exist. For all those reasons, helicopters should be available for infestations not vet mapped in this EIS, just like helicopters are widely available for use on the other federal land managing agency lands – including the National Park Service. (11)

RESPONSE: The Responsible Official considered, but did not develop the alternative of including aerial in EDRR. Several risk factors increase the uncertainties of the effects of aerial treatment, thus further NEPA would be needed once infestation sites are known and can be more fully analyzed. Spot and hand treatments are more easily controlled by the operator (applicator), thus effects are less variable and there is less risk of off site movement of herbicides. Aerial treatment must be analyzed assuming increased risk of off site movement (drift) and thus, the analysis specificity needs to be greater.

130. COMMENT: Aerial treatment regulations are exhausting to the point of making the treatments unmanageable. (12)

RESPONSE: The PDFs seem cumbersome in their attempt to explain limitations on treatment prescriptions applied to different target species and site conditions. Many of the PDFs are reiterations of herbicide label guidance and standard operating procedures for Forest Service projects. Others are a result of an analytical effects analysis (such as limitations on herbicide application rate to ensure exposures remain under a threshold of concern).

131. COMMENT: Specific changes needed to control measures. (12)

RESPONSE: A number of CCM have been amended according to recommendations of ODA's weed expert Daniel Sharrat.

132. COMMENT: Effective cultural / mechanical and biological treatments should be considered in all situations and utilized when they are likely to be as effective as chemical treatment. (14)

RESPONSE: Manual and mechanical and biological treatments will be used where they will meet the Purpose and Need of this project, are cost-effective or required by design features.

133. COMMENT: We support the emphasis on inventorying, monitoring and early treatment as described in the 'Early Detection Rapid Response' (EDRR) approach. We encourage the Forest Service to utilize the EDRR approach as a means to reduce the use of herbicide over time as well as preventing the spread of invasive plants. (14)

RESPONSE: Acknowledge support for EDRR.

134. COMMENT: The draft EIS indicates that the proposed project would cover about 23, 000 acres. Information on page 91 also indicates that the life of the proposed project would be a maximum of 40,000 acres. Figure 16 on page 107 further shows a declining trend when comparing the spread of invasive plant between now and when the proposed project will be complete in year 2020. It is not clear what the actual project treatment area is - 23000 or 40000 acres. The final EIS should clarify what the life of the project would be and appropriate rate of invasive plant infestation on the forest. (15)

RESPONSE: There are about 23,000 acres of known, noxious weed infestations. The life of the project cap includes these known sites and potential new infestations since new infestations and spread of some exsiting infestations are expected during the life of the project. The rate of spread is about 10%, however as treatments effectively reduces target populations, the acreage subject to spread would be reduced.

135. COMMENT: Section 2.3.6 (p. 83) indicates that new herbicides approved by the EPA may be used by the project to treat invasive plants. Because it is virtually impossible for EPA to identify all conceivable risks and address all uncertainties associated with pesticide use, it would be prudent to first assess the impacts of new herbicides on local resources and take additional precautions before their use. The final EIS should provide information about the process that would be followed in selecting new herbicides for use on the forest and their adverse sublethal effects. (15)

RESPONSE: New herbicides would be subject to a risk assessment, biological assessment, and at the least, a Section 18 NEPA Supplemental Information Report. Adding new herbicides would require a FP Amendment.

136. COMMENT: On page 257, the draft EIS states that no invasive plant treatment of any kind is proposed for the Baker watershed. It is not clear, whether invasive plants exist in the watershed and if yes, how they would be treated to protect sources of drinking water in the watershed. Please provide that information in the final EIS. (15)

RESPONSE: The DEIS reads, "No invasive plant treatment sites are within the Baker Watershed, therefore no treatments of any kind are proposed." (section 3.4.2). As stated there are no known weed sites in the Baker municipal watershed.

137. COMMENT: Page 103 of the DEIS states that restoration and revegetation activities that include ground disturbing activities such as disking or plowing would require additional NEPA analysis. Page B-27 (Revegetation Guidelines Document) states that you need to conduct "roughing-up" or terracing for revegetation. Please clarify if roughing-up or terracing is considered ground disturbing and would require separate NEPA analysis. Because it is likely that some treatment areas will require revegetation, the need to conduct additional NEPA analysis would significantly delay, and perhaps deter, revegetation efforts. (17)

RESPONSE: Ground-disturbing in the context of page 103 meant use of heavy equipment. No heavy equipment is currently proposed. Restoration that requires heavy equipment would require separate, site-specific NEPA analysis.

138. COMMENT: For infested sites, develop site strategy within 2 years of site identification. (8)

RESPONSE: Strategies have been developed for known sites and would be in place for new detections as soon as possible. Treatment of new infestations of aggressive invaders would be a high priority and will likely happen within 2 years of discovery using the "Implementation Planning" process discussed in section 2.2.3.

139. COMMENT: What is the composition of hot foam? (21)

RESPONSE: Hot Foam system is comprised primarily of a diesel-powered boiler and foam generator, which deliver hot water with a foam surfactant to target weeds via a supply hose and a treatment wand. The surfactant foam is a biodegradable mixture of corn and coconut sugar extracts, and that the foam is an "organic," naturally-occurring compound. As such, it is not regulated (or labeled) as an herbicide product by the U.S. EPA.

140. COMMENT: Page 100 says that aerial herbicide treatments using helicopters is proposed for all herbicide application sites on the Wallowa-Whitman National Forest due to terrain and access issues. Explain this statement. (21)

RESPONSE: Sentence had been edited to clarify. It now reads: "For sites where aerial herbicide treatments are proposed, helicopters, not fixed wing aircraft would be used due to terrain and access issues on the Wallowa-Whitman National Forest."

141. COMMENT: There should be a requirement to use nonherbicide methods where effective. (21)

RESPONSE: This was considered but deliberately not chosen by the Regional Forester. This was Alternative B which is described in brief and reasons for not being selected discussed in the R-6 2005 ROD (USDA Forest Service 2005, page 6).

142. COMMENT: Footnote 3 on page 105 admits that only 33 of the proposed aerial acres could not be controlled by other methods. (21)

RESPONSE: That foot note is accurate. While other methods may effectively treat the site identified to receive aerial herbicide application, aerial application has been determined to be safe, effective and more cost efficient than other methods.

143. COMMENT: More treatment options means more impacts – not just more effectiveness. This should be taken into consideration. (21)

RESPONSE: Treatment impacts are addressed and minimized through PDFs.

144. COMMENT: We want a guarantee that herbicide use will be reduced over time, starting with a smaller increase than proposed initially. (21)

RESPONSE: The Forest Service expects herbicide use to decline over time if effective treatments are implemented. Treatments will be followed by either active or passive restoration, and the restoration would be monitored over time. The restoration is aimed at establishing native plant communities, which would reduce and eliminate the need to use herbicides over time. Treatment of invasive source populations and implementing the planned rapid response plan would also serve to reduce long-term herbicide use.

145. COMMENT: Table 28 says that other methods are available beside chemical treatments - use them. (21)

RESPONSE: Many methods will be used. This analysis focuses on effects of herbicides because 1) new herbicides and standards for their use became available in 2005; 2) public issues do not focus on effects of nonchemical methods, Nonherbicide methods are favored under No Action. The No Action Alternative has been considered in detail and was fully considered but not chosen by the Responsible Official.

146. COMMENT: Page 109 states that the majority of sites are less than one acre and 66 percent are less than 5 acres. This indicates herbicides are not necessary. (21)

RESPONSE: Statement was inaccurate and has been corrected to read, "About 40 percent of inventoried sites are less than one acre...." This is still a large percentage and though for some species on some sites manual mechanical could be an effective alternative, the reality is that, on average, manual mechanical costs about 2.5 times as much as herbicide applications. Given a limited budget it is imperative that treatments be cost efficient so the most acres possible can be treated.

147. COMMENT: The proposed 111 acres of manual and mechanical treatment is pathetically low. (21)

RESPONSE: The Proposed Action assumes maximum herbicide use so that the effects of the most ambitious conceivable program are disclosed. Manual and mechanical treatments will be used where cost-effective or required by design features. Also see response to comment 142.

148. COMMENT: Cultural treatment methods on page 39 state that "prescribed burning and grazing animals may not be used on the project." We feel it is mistake to eliminate tools from the tool box. Especially for medusahead control, burning the thatch before applying herbicides is the most effective method. Less herbicide can be applied more efficiently. (25)

RESPONSE: Prescribed burning has not been included because some burning applications could actually encourage invasive weed spread.

149. COMMENT: Fertilization is mentioned in this section as possibly accompanying seeding. However fertilization in arid environments almost always leads to an increase of annual weedy species. Fertilization should not be considered where cheatgrass, medusahead or other annual weedy grasses pose a threat to revegetation. It is a waste of public funds. (25)

RESPONSE: Fertilization would only be considered where weeds are eradicated and benefit to establishing native plant communities is known.

150. COMMENT: A hand broadcast treatment is usually preferable over spot treatment. Spot treatment is a slow approach that often misses rosettes, seeds and roots and leads to many more years of treatment. (25)

RESPONSE: Spot treatment is appropriate where 1) invasive plants are scattered, 2) sensitive resources in the vicinity. Spot treatment reduces the extent and intensity of potential exposures to nontarget species.

Purpose and Need

151. COMMENT: The EIS necessarily contains a tremendous amount of detail about herbicides. However, there is a comparatively very small amount of explanation of the outstanding resources that full appropriate use of herbicides is intended to protect. Furthermore, there is little information or description about the rate at which the weeds are spreading. The EIS contains some good information on these topics however, it is scattered and buried deep in the huge document. (11)

RESPONSE: Based on a number of parallel comments, language has been added beginning with section 1.3 Purpose and Need, emphasizing the important of resources at risk and the cost to those resources of being compromised by displacement by weeds.

152: COMMENT: At least a page or two (or more?) needs to be added very early on page one, under: "Purpose/Need/Background". Then of course substantial portions of that would be put in the "Summary" and "Abstract". It seems like this matter addresses the essence of why herbicides are needed along with the need for a better appreciation of results of reduced protection where herbicides are either restricted or not allowed. This EIS and Appendices contain 772 pages (no criticism intended). Wouldn't a couple/few pages now added (even if parts of it are also contained later in the document) be well worth the effort? How else can the readers be expected to begin to appreciate the seriousness of the current and future field conditions? (11)

RESPONSE: Introductory paragraphs were added to The Purpose and Need section (1.3) and a related statement to the Desired Futrure Condition section (1.2) to better establish the importance of maintaining and protecting native plant systems.

153. COMMENT: See Asher comments on weed spread. Consider printing his comments verbatim...hard to separate into nuggets. To paraphrase: invasive plant spread is more complex than a set rate – add some better description to the FEIS. (11)

RESPONSE: Selected Asher comments used to contextualize weed spread in Sections 1.1 and 1.3. Also clarification of the rate of weed spread for economic analysis was added to Section 3.8.3 based on Mr. Asher's professional research.

154. COMMENT: Effects to recreation should acknowledge there are documented cases (not uncommon) of stem injection of Japanese knotweed causing mortality to adjacent shrubs. (7)

RESPONSE: Section 3.4.3, where stem injection of Japanese knotweed is specifically discussed, has been edited to acknowledge potential adverse effects.

155. COMMENT: The recreation section refers to chemical treatments leaving dead vegetation that would be noticeable for weeks or months. Not necessarily true. Many of the treatments that are most effective for perennial or biennial plants are in the fall. In many cases there is functionally no visible impact, as well as a much smaller visitor impact since use is lower during that season. (7)

RESPONSE: Section 3.6.3 edited to acknowledge effective fall treatments that would not have visual effects.

156. COMMENT: We request the Botanical Biological Evaluation for this project. (21)

RESPONSE: None needed.

157. COMMENT: Guidelines for Revegetation of Invasive Weed Sites and Other Disturbed Areas on National Forests and Grasslands in the Pacific Northwest in Appendix B provides excellent guidance and procedures for revegetation after weeds have been controlled on a site. (25)

REPSONSE: None Needed.

158. COMMENT: The SERA Risk Assessments are not site-specific and do not adequately represent risks, given the environmental conditions and species on the W-W National Forests. There are uncertainties related to herbicide use that need to be quantified, such as adjuvants, impurities, and inert ingredients. (21)

RESPONSE: The SERA Risk Assessments are national in scope but provide information about the relative toxicity of various herbicides under a specific set of assumptions that tend to overestimate effects because 1) PDFs are not included in the model and 2) the model assumes 100% coverage of each acre of treatment. These factors reduce the potential for exposure. Site-specific modeling has occurred for the part of the project considered at highest risk of delivery of herbicide to fish habitat. Table 57 in section 3.5.3 reports the results of those tests.

159. COMMENT: The assumption that there are no plausible harmful exposures to people from herbicide use in this project is arrogant and false. You cannot guarantee human health will be protected. Our appeal of the R6 decision is partly based on the weakness of risk assessments. (21)

- RESPONSE: The Risk Assessments characterize risk of adverse effects to nontarget organisms using laboratory and field studies of toxicity, exposure, and environmental fate and address concerns about acute and chronic exposures, risk of cancer, reproductive failures, etc. Risks from accidental spills and accidental ingestion are also included in the risk assessments. The thresholds of concern were reduced in the R6 2005 FEIS to account for risk to federally listed species, following protocol used by the EPA. Uncertainties are addressed through the Project Design Features that further limit unnecessary or unwanted human exposure. These include PDFs "K" Public Notification, "L" Special Forest Products, "M" American Indian Tribal and Treaty Rights, and "O" Human Health. (see section 2.2.3)
- The appeal response from WO stated: "analysis of effects for hexachlorobenzene, nonylphenol polyethoxylate-based (NPE) surfactants, and inert ingredients under different treatment and exposure scenarios were conducted in the Human Health and Ecological Risk Assessments (HHERA) and documented in FEIS Appendix Q for those herbicides in which they are considered to be contaminants or for which the surfactants are used as an adjuvant. See HHERA for picloram, p. 3-12; clopryalid, p. 3-20; and NPE surfactants, pp. 49-54, and triclopyr, p. 4-22. Based on the indicated information, I find adequate consideration and analysis of effects of chemical contaminants, inert ingredients, and surfactants in the FEIS."

Trails and Campground Monitoring

160. COMMENT: There should be some mention of monitoring trails and campgrounds used by off road vehicles and wash stations to prevent the spread of noxious weeds. (1)

RESPONSE: Ongoing inventory is included as an objective in the Wallowa-Whitman Forest Plan. Monitoring of treated areas is discussed in Annual Implementation Planning topic of section 2.2.3. Prevention practices such as washing vehicles are required as part of the R6 2005 ROD standards. Vehicles and equipment that leave the road are to be washed...W-W prevention guidelines in Appendix B

Treatment Effectiveness

161. COMMENT: Please send Erickson 2006 reference. Explain why manual and mechanical methods are not considered effective. Other references indicate that low priority species should be treated with successful nonherbicide methods. (21)

RESPONSE: Erickson (personal communication 2006) thought that 25% effectiveness was probably close if even a little high with relation to treatment of newly established invasive species on the forest using manual control methods only. This is due to the need for more repeated entries over a longer period of time. Suggested reasons for low percentage of manual/mechanical methods added to section 3.1.6.

162. COMMENT: The discussion about manual and mechanical methods is inadequate because it does not provide analysis of full range and potential for manual and mechanical control methods. (21)

RESPONSE: The document emphasizes effects from herbicides because 1) nonherbicide methods are already approved; 2) analysis for effects of nonherbicide treatments (Appendix J of the R6 2005 FEIS) indicates a low level of risk from these treatments; and 3) with the exception of whether or not they are fully effective, there are few concerns expressed about effects of nonherbicide treatments. Therefore a full range of manual and mechanical control methods are available. A statement acknowledging the availability of a full range manual and mechanical control methods has been added to section 3.1.6.

163. COMMENT: The assumptions of treatment effectiveness on page 107 are not justified. (21)

- RESPONSE: There is no way to precisely estimate exactly how invasive plant populations will respond to each treatment. Results vary widely depending on the species being treated, the length of time for which the target population has been established, the objectives of treatment, and local conditions (including but not limited to density and size of infestation, topography, soils, weather during time of treatment). Practitioners report that the same treatment on a similar site may be more or less effective. The 80 percent estimate is based on anecdotal evidence consistent with other invasive plant projects across the Pacific Northwest Region (Olympic, Gifford Pinchot, Mt Hood). The 80 percent effectiveness assumption illustrates that some repeated treatment will be necessary to accommodate skips and regrowth.
- In contrast, nonherbicide treatments usually require a greater number of repeated visits and a longer time before invasives are controlled; and in many cases, eradication is impossible. The estimates used in the DEIS are intended to demonstrate these concepts and provide comparison of the relative effectiveness of various treatment methods under each alternative. Herbicides (used in combination with nonherbicides treatments) will be used where needed and effective.

164. COMMENT: The assumption that herbicide use is 80 percent effective and that manual and mechanical treatment is 25 percent effective is a biased assumption with no basis. It completely disregards the complexity of treatments, timing, and repetition over time for effective control. (21)

RESPONSE: There is no way to precisely estimate exactly how invasive plant populations will respond to each treatment. Results vary widely depending on the species being treated, the length of time for which the target population has been established, the objectives of treatment, and local conditions (including but not limited to density and size of infestation, topography, soils, weather during time of treatment). Practitioners report that the same treatment on a similar site may be more or less effective. The 80 percent estimate is based on anecdotal evidence consistent with other invasive plant projects across the Pacific Northwest Region (Olympic, Gifford Pinchot, Mt Hood). The 80 percent effectiveness assumption illustrates that some repeated treatment will be necessary to accommodate skips and regrowth. In contrast, nonherbicide treatments usually require a greater number of repeated visits and a longer time before invasives are controlled; and in many cases, eradication is impossible. The estimates used in the DEIS are intended to demonstrate these concepts and provide way to compare the effects of the most ambitious

treatment under each alternative. Herbicides (used in combination with nonherbicides treatments) will only be used where needed and effective. Erickson (personal communication 2006) thought that 25% effectiveness was probably close if even a little high with relation to treatment of newly established invasive species on the Forest using manual control methods only.

Tribes

165. COMMENT: We are concerned by potential for Native people to be exposed to herbicides or have their cultural uses curtailed due to herbicide use. The EIS contains insufficient analysis of cumulative effects on cultural uses. (21)

RESPONSE: Tribal consultation is ongoing and Native American Tribes express support for the project. No effects on cultural uses are expected.

Water

166. COMMENT: We are concerned that treatments near 303(d) listed waters or road ditches that drain into waterways could further degrade water quality. Because information about the level of herbicides that may reach waterways and potential adverse sublethal effects was not included, it is possible that impacts to water quality could be more significant than anticipated. (15)

RESPONSE: Information about the level of herbicides that may reach waterways, and sublethal effects are discussed in the EIS and in the R6 EIS to which it is tiered. "General Effects of Herbicide Treatments" and "Drift, Run-off, and Leaching" topics of section 3.4.3 inform the reader of the studies about the possibility of herbicides entering waterways. Precautions taken and PDFs designed are also discussion (see PDFs F-1 -8; G, and H1-13 in section 2.2.3). This reference to the specific PDFs has been added to the text.

167. COMMENT: While the draft EIS identifies impaired water bodies within the project area and parameters for which they were listed (Table 38, p. 254), it does not include data about water quality criteria specifically, what the numeric water quality standard exceedences are for listed waters. Without this information, it is difficult to know whether the proposed weed treatments will exacerbate conditions in impaired streams or not. Additional information that may be useful can be found in a recent Memorandum Of Agreement (MOA) (September 28, 2007) between EPA and FS which identifies specific actions that can be taken to address water quality impairments and restoration on national forest system lands. The final EIS should include numeric standards for which impaired streams are listed and data demonstrating that state water quality standards would be met. (15)

RESPONSE: Given the extensive project specific pdfs required by this project, it is unlikely invasive plant treatments would exacerbate problems on the 303d listed streams within the project area. While treatments could occur on 248.5 acres within 100 feet of 20 different streams, most of the invasive plants are in scattered patches with desirable plants nearby. No emergent treatments would occur. Within 100 feet of the stream, no broadcast treatment is allowed under the proposed action. All treatments are targeted directly on the invasive plant leaving native and desirable vegetation in place. If a native seed bank is not present, planting or seeding with native or desirable species would occur after treatment. Of the 20 streams in treatment areas on the 303d category 5 list 19 are listed for temperature. The Snake River has a TMDL in place for temperature but is still listed for mercury. With the exception of Japanese knotweed, the plants to be treated are less than 2-3 feet tall and add little to no shade for the streams. The Japanese knotweed can be 6 feet tall but this is still not tall enough to provide shade where it is found along the Snake River.

The streams adjacent to treatment areas are listed for temperature with the following criteria:

- Redband or Lahontan cutthroat trout: 20.0 degrees Celsius 7-day-average maximum
- Bull trout spawning and juvenile rearing: 12.0 degrees Celsius 7-day-average maximum
- Core cold water habitat: 16.0 degrees Celsius 7-day-average maximum
- Salmon and trout rearing and migration: 18.0 degrees Celsius 7-day-average maximum
- Salmon and steelhead spawning: 13.0 degrees Celsius 7-day-average maximum

Wildlife

168. COMMENT: Drop herbicide use in lynx habitat. They require protection. (21)

RESPONSE: To maintain suitable unoccupied habitat includes minimizing invasives intrusion into snowshoe hare habitat. This is considered important and the risk of adverse effect from herbicide treatment so remote the conclusion is to allow treatment of the 706 acres of currently known infested habitat and potential future infestations as a benefit to possible future Lynx populations.

169. COMMENT: Wolverines are scavengers meaning they can bioaccumulate toxins. No herbicide use in wolverine foraging habitat. (21)

RESPONSE: The possibility of wolverines even contacting herbicide on this Forest is extremely remote. Wolverines are not even a certainty on the Forest. Besides this less than 0.2 of 1 percent of preferred wolverine habitat even has invasive plants. Finally the analysis done showed that only a remarkably high concentration of trichlorpyr, which would result from ingesting a pray species mostly covered with the herbicide, would exceed a safe toxicity index. Since PDF F-1 requires triclopyr to be spot sprayed, not broadcast sprayed, the potential of herbicide poisoning happening or harming a wolverine is virtually zero under any alternative (see sections 3.3.4 and 3.3.6).

170. COMMENT: Pacific fisher has a high risk of toxic contamination from their food source of small animals. No herbicide use in fisher habitat. (21)

RESPONSE: There are no known pacific fishers on the Forest. Close to 0.5 of 1 percent of potential habitat have invasive weeds on it. As with the wolverine, between the minute possibility that a fisher would come in contact with herbicides and the PDFs in place to reduce potential for exposure, there is virtually no threat to this species under any alternative (see section 3.3.4).

171. COMMENT: Prohibit herbicide use in bighorn sheep, bald eagle and spotted bat habitat. They are vulnerable to toxic exposure through their food sources. (21)

RESPONSE: DDT use in the past did great harm to Bald Eagles. The wonderful recovery and delisting of the species is recognition that modern herbicide use and herbicides can be used without harm to eagles. See section 3.3.6 and PDFs J1a and J1b that will reduce potential for exposure. Presently there are no nests within .5 mile of any known infestation. Also see section 3.3.6 that details why bighorn sheep and spotted bat exposure is remote and what protective measures will protect these species.

172. COMMENT: We are concerned about bioaccumulation of herbicides and effects to peregrine falcons from disturbance of nest sites (21)

RESPONSE: In section 3.3.6 it explains that currently no peregrine falcon nest sites occur within 1.5 miles of any proposed treatment area. Additionally, implementation of PDFs (J3) will ensure that no treatment would occur near any new nests established (J3a through J3f).

173. COMMENT: Prohibit herbicide use in habitat for all listed, focal species and MIS, including sage grouse. Maintain plant diversity. (21)

- RESPONSE: As discussed for the individual species above, the potential of exposure is small because the percent of habitat infested with invasive plants is small and because protective wildlife PDFs are in place to further reduce the possibility of exposure. For details about MIS species see section 3.3.7; and for species of local interest see section 3.3.8.
- Because treatment of invasive weeds will lead to greater diversity of native plant species, in the long term, this project will benefit all wildlife species that directly or indirectly depend on native plant communities.

174. COMMENT: Avoid herbicide impacts to suitable amphibian habitat including Columbia spotted frog. Avoid use of herbicide in pileated woodpecker nesting habitat since they are in decline and could be negatively affected. Avoid herbicide use in goshawk and pine marten habitat, and primary cavity nesters (except on roads with nonbio-accumulating herbicides). Use less herbicide so that songbirds are not negatively affected – do not contribute to their decline. Drop pileated woodpecker nesting habitat from herbicide use since they are in decline and could be negatively affected. Determinations about grouse, falcon, goshawk, cavity excavators, landbirds and woodpeckers are not substantiated. (21)

RESPONSE: See PDFs in section 2.2.3 for specific PDFs that will reduce potential for exposure. For specifics about each species of concern see section 3.3.

175. COMMENT: Herbicide use in this project may contribute to the listing of Columbia Spotted Frog. Acknowledge effects of riparian spraying. (21)

RESPONSE: Section 3.3.6 states, currently, none of the locations where the Columbia frog is known to occur contain invasive plants. Due to the small size and scattered nature of suitable habitat, it is not known exactly how much of the suitable habitat for theses species is currently infested with invasive plants. However of the 8,669 acres of shoreline habitat and 2,703 acres of spring habitat, 29 acres and 76 acres respectively have known invasive plants. With the small amount of habitat effected (<0.1 of 1 percent) and with the buffers on lakes and ponds (see Table 9) the Columbia Spotted Frog is adequately protected.

176. COMMENT: Determinations do not acknowledge higher vulnerability of grazing animals such as Rocky Mountain elk and to chronic exposures of herbicide. (21)

RESPONSE: 98 percent of elk habitat on the Forest, including identified calving habitat is not identified for herbicide treatment. Considering this small percentage and the large continuous ingested exposure NPE or Triclopyr necessary to a toxicity dose, it would be virtually impossible for this level of exposure to occur to elk under this project (see the elk topic in section 3.3.7 for more details). Triclopyr and NPEs are further limited in their use by PDFs F-1 and F-4 respectively (see PDFs topic in section 2.2.3)