United States Department of Agriculture
Forest Service
Nez Perce-Clearwater National Forests
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eFile Code: 1950
Date: December 22, 2014

Honorable Silas Whitman
Chairman
Nez Perce Tribal Executive Committee
P.O. Box 305
Lapwai, ID 83540

Dear Honorable Chairman Whitman

The Forest Supervisor of the Nez Perce–Clearwater National Forests is initiating an environmental analysis for the Gospel-Hump Wilderness Invasive Plant Management Project (Project). The Project proposes to manage invasive plants using an integrated strategy, which includes manual, cultural, chemical, and bio-control treatments.

I would like to initiate government-to-government consultation with you about this Project if you feel that it may affect resources of interest to the Nez Perce Tribe. I realize you must set priorities and adjust the level of consultation to match your concerns for each individual project. Please provide a sense of how important this Project is from your perspective, and we can jointly tailor the consultation activities to match. I look forward to meeting with you at any time during the development of this Project and would appreciate your thoughts and input.

Your comments on this proposal may be used to refine our Proposed Action and/or to develop alternative actions to address the project purpose and need. The Proposed Action and alternatives (if identified) will be evaluated during the environmental analysis process. At this time, we anticipate that this analysis will be documented in an environmental assessment (EA), which will be sent to individuals who have responded to this scoping letter, as well as those individuals and groups that request a copy.

BACKGROUND

The Project area encompasses approximately 200,500 acres, which includes all of the Gospel-Hump Wilderness. The Gospel-Hump Wilderness is located 24 air miles from Grangeville, Idaho. This area drains into both the Salmon and South Fork Clearwater Rivers and located within the Elk City and Salmon River Ranger Districts. See Figure 1, Vicinity Map.

EXISTING CONDITIONS

All National Forest System lands on the Nez Perce–Clearwater National Forests and surrounding National Forests, including designated wildernesses, have strategies for treating invasive plants; these strategies include the use of herbicides. The Frank Church—River of No Return Wilderness and the Selway-Bitterroot Wilderness have invasive weed strategies based on adaptive management and an integrated weed management approach that utilizes mechanical, biological, and herbicidal control. The Forest Service is able to treat invasive weeds under these strategies with the objective of perpetuating native plant communities and protecting wilderness values.

The Gospel-Hump Wilderness utilizes the older Forestwide Nez Perce Noxious Weed Control Program. This program uses an integrated management approach but limits herbicide use in the Gospel-Hump Wilderness.

Invasive weeds exist on and are increasing within the Gospel-Hump Wilderness[1]. Without efforts to control these weeds, they will continue to expand into new areas and the number of new weed species will increase.

Current Laws, Policies, and Direction

Direction and authority for invasive weed management is provided in the National Forest Management Act (PL94-588), Federal Land Policy and Management Act (PL 94-579), Wilderness Act of 1964 (PL 88-577), Carlson-Foley Act (PL-583), Federal Noxious Weed Control Act (PL-629), and Idaho's noxious weed law (Idaho Code Title 22-2402).

DESIRED CONDITION

The Wilderness Act contains several key statements that define the desired conditions. The Act defines wilderness as an area of undeveloped federal land "...administered for the use and enjoyment of the American people in such a manner as will leave [it] unimpaired...where earth and community of life are untrammeled by man...that retains its primeval character and influence...which is protected and managed so as to preserve its natural condition."

The Nez Perce Forest Plan (USDA Forest Service 1987) provides additional information to define the desired condition. The relevant Forest Plan direction is described below.

Forestwide Direction

Goal 8: Protect and enhance wilderness values and character in designated wildernesses (USDA Forest Service 1987, p. II-1)

Goal 14: Protect resource values through the practice of integrated pest management (USDA Forest Service 1987, p. II-2)

Objectives—Wilderness

The...Gospel-Hump...Wilderness will be managed according to the objectives of the appropriate wilderness legislation and the individual management plans (USDA Forest Service 1987, p. II-3)

Public education will be used to ensure public understanding to achieve respect for the resource, restraint, and willingness to adhere to appropriate uses (USDA Forest Service 1987, p. II-3)

Improve and emphasize interagency coordination and consistency (USDA Forest Service 1987, p. II-3)

Ensure that the wilderness management practices maintain or enhance wilderness conditions as directed in the Wilderness Act (USDA Forest Service 1987, p. II-3)

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[1] Nez Perce–Clearwater National Forests Invasive Weed Database

Standards

1. Emphasize public education by utilizing wilderness education techniques, providing useful interpretive material on wilderness values and ethics, and developing and distributing materials on no trace camping (USDA Forest Service 1987, p. II-17)

3. Provide the public the opportunity to join in management through appropriate use. Involve the public in preparing wilderness management plans and in monitoring implementation of these plans (USDA Forest Service 1987, p. II-17)

5. Share ideas, concerns, and techniques relating to wilderness management with other agencies, educational institutions, and interest groups on national, regional, and local levels (USDA Forest Service 1987, p. II-17)

9. Promote consistency and reduce management costs through interagency cooperation and coordination of wilderness management (USDA Forest Service 1987, p. II-18)

10. Ensure that wilderness management practices manage indigenous plants and animal communities to sustain natural processes with emphasis on preserving endangered and threatened species, assuring that levels of human uses are compatible rather than detrimental, as required by the Wilderness Act (USDA Forest Service 1987, p. II-18)

Management Area 9.2, Gospel-Hump Wilderness

Goal: Manage in accordance with the Wilderness Act of 1964 and the Endangered American Wilderness Act of 1978. Maintain and enhance the quality of the Gospel-Hump Wilderness. (USDA Forest Service 1987, p. III-26)

Standards

Range: 1. Maintain natural vegetation composition (USDA Forest Service 1987, p. III-27)

PURPOSE AND NEED

After considering the existing and desired conditions and answering the question, "Why consider taking any action?" the following Purpose and Need statement was developed:

Develop an invasive plant management strategy for the Gospel-Hump Wilderness, consistent with the adjacent wilderness area's invasive plant management strategy, to prevent the establishment of new invaders and reduce the impacts of established invaders on native plant community stability, sustainability, and diversity, while meeting the desired condition of the Forest Plan.

PROPOSED ACTION

The Proposed Action for the Project is to have the same invasive weed strategy as the Selway-Bitterroot Wilderness as determined by the *Selway-Bitterroot Wilderness Invasive Plant Management Project Final Environmental Impact Statement* (USDA Forest Service 2009a) and Record of Decision (ROD) (USDA Forest Service 2009b), but with treatment areas specific to the Gospel-Hump Wilderness. This strategy has been successful in the Selway-Bitterroot Wilderness over the last five years and has enabled many newly developed partners to treat hundreds of acres of invasive species, including new invaders. The Proposed Action was developed to meet the intent of Forest Plan Standard #9, which states, "Promote consistency and reduce management costs through interagency cooperation and coordination of wilderness management" (USDA Forest Service 1987).

A full description of the Proposed Action and associated Design Criteria can be found at http://www.fs.fed.us/nepa/nepa_project_exp.php?project=45921. Other items located at the same location include proposed best management practices, spill prevention and safety plan, education plan, herbicide descriptions, noxious weed list, description of integrated weed management and adaptive management strategy, weed prevention strategy, wilderness minimum tool decision guide, and a glossary. This information is also available hard copy on request or for review at the Nez Perce-Clearwater National Forests offices in Kamiah and Grangeville, Idaho; the Red River Ranger Station in Elk City, Idaho; and the Salmon River Ranger District in White Bird, Idaho.

The four primary strategies that would be used to achieve the overall purpose of this Project are Adaptive Management, Integrated Weed Management, Minimum Tool, and Prevention. These are the same strategies being used in the Selway Bitterroot Wilderness Invasive Plant Management Project final environmental impact statement and ROD (USDA Forest Service 2009a,b).

The Proposed Action includes a requirement for all Forest Service administrative stock be held for 48 hours in a weed-free facility, including feed, and the use of an educational program to achieve voluntary compliance, by the public, with prevention measures, including grooming and feeding stock weed-free feed for 48 hours prior to entering the wilderness.

Treatment Objectives

The following five treatment objectives (part of an integrated strategy) may be applied to any one area within a watershed:

Prevention

Reduction (suppression)

Containment

Eradication

Elimination

Priority treatment areas include areas that are most vulnerable to seed introduction and dispersal due to human traffic patterns, areas where weeds currently exist and may expand their range, and weed-free areas with pioneering invasive infestation and areas that are highly susceptible to invasion by new or uncommon invasive plants. Additional treatment areas may be evaluated over the life of the Project by applying the principles of "adaptive management."

Treatment Types

The Proposed Action would use manual/cultural (e.g., hand pulling), herbicide, and bio-control treatment methods that are ground based and selective to control and reduce weeds. As such, other methods, such as aerial spray application and the grazing of domestic animals to reduce weeds, would not be considered.

Use of each treatment type would be limited to the acreages described below for the entire Project area and focuses on locations near roads, trails, trail heads, dispersed campsites, administrative sites, and private lands :

- Manual/cultural treatment—up to 200 acres per year (limited by man power and/or budget)
- Herbicide treatment—up to 1,275 acres/year
- Bio-control treatment—up to 20,000 acres over the life of the Project

Manual treatments, such as hand pulling and grubbing, would occur on sensitive areas or in very small infestations. Cultural treatments would enhance desirable vegetation. Chemical treatments would consist of ground-applied herbicides and supplemental compounds. Equipment, such as horse and backpack sprayers, would be used inside the Wilderness. Biological controls, primarily insects, would continue to be introduced, where appropriate, and newly approved agents would be considered for use where environmental conditions would support their use.

Watershed Treatment Areas

Each watershed was classified into one of the three following categories based on the degree of current infestation (see Figure 2):

- Weed Free Watersheds
- Early Infestation Watersheds
- Advanced Infestation Watersheds

Weed-free Watersheds

Weed-free watersheds have the following objectives:

- Use prevention and education methods to reduce the potential for invasive weeds to spread into weed-free areas
- Eliminate starts of target invasive weeds species that are present in the Project area
- Eradicate all target invasive weeds species that are new to the Project area

The following treatments, with the following guidelines, can be used in weed-free watersheds:

- Manual/cultural treatment—Treat where feasible
- Herbicide treatment—Treat all areas, including trails, camps, and high-risk susceptible dispersed habitat types, as needed, as new invasive plants are discovered
- Bio-control treatment—None currently needed; evaluate and treat when needed

Early Infestation Watersheds

Early infestation watersheds have the following objectives:

- Reduce the density and range of target invasive weeds species currently present in the Project area
- Eradicate all target invasive weeds new to the Project area

The following treatments, with the following guidelines, can be used in weed-free watersheds:

- Manual/cultural treatment—Treat where feasible
- Herbicide treatment
  - Designated Treatment Areas: Treat up to 100% of known infestations in designated areas (e.g., roads, trails, administrative sites, airstrips)
  - Dispersed Treatment Areas: Treat all areas, including trails, camps, and high-risk susceptible dispersed habitat types, as new invasive plants are discovered

- Bio-control treatment—Treat all infestations capable of sustaining reproducing colonies of bio-control agents (primarily insects)

Advanced Infestation Watersheds

Advanced infestation watersheds have the following objectives:

- Contain the spread of target invasive weeds (e.g., spotted knapweed, St. Johnswort, and sulfur cinquefoil) that are more common in the Project area by reducing seed transport along priority vector corridors and contact sites, such as system trails, camps, airstrips, administrative sites, and roads
- Contain the spread of target invasive weeds into and out of private inholdings within the wilderness portion of the Project area.
- Reduce the density and range of less common target invasive weeds (such as oxeye daisy)
- Eradicate all target invasive weeds species that are new to the Project area

The following treatments, with the following guidelines, can be used in weed-free watersheds:

- Manual/cultural treatment—Treat where feasible
- Herbicide treatment
  - Designated Treatment Areas: Treat up to 100% of known infestations in designated areas (e.g., roads, trails, administrative sites, airstrips)
  - Dispersed Treatment Areas: Treat all areas, including trails, camps, and high-risk susceptible dispersed habitat types, as new invasive plants are discovered
  - Salmon River camps: Treat all sites at an average of 1 acre each year
- Bio-control treatment—Treat all infestations capable of sustaining reproducing colonies of bio-control agents

REQUEST FOR SCOPING COMMENTS

This comment period provides those interested in or affected by this proposal an opportunity to make their concerns known. When the EA for this Project is completed, we will send it to those who have commented on the proposal and a legal notice for comment for the EA will be published in the Lewiston Tribune. You will have another opportunity to comment on this Project at that time.

Please review the proposal and provide us with your written comments. To ensure your comments are fully considered during the analysis of this Project, please submit your comments by January 21, 2015.

The proposed Project is an activity implementing a land management plan and is subject to 36 CFR 218 regulations (subparts A and B). Only individuals or organizations who submit timely and specific written comments (as defined in 36 CFR 218.2) regarding the proposed Project during this or another public comment period established by the designated official will be eligible to object to the decision. Please submit your comments by one of the methods detailed below.

Mail or hand-deliver your comments to Cheryl Probert, Forest Supervisor, Nez Perce–Clearwater National Forests, 903 3rd Street, Kamiah, Idaho 83536. Office hours are 7:30 A.M. to 4:00 P.M., Monday through Friday (except federal holidays).

Email your comments to comments-northern-nezperce-red-river@fs.fed.us. The subject line must contain the name of the project for which you are submitting comments (i.e., Gospel-Hump Wilderness Invasive Plant Management Project). Acceptable formats are MS Word, PDF, or RTF. For electronically mailed comments, the sender should receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive an automated acknowledgement of the receipt of comments, it is the sender's responsibility to ensure timely receipt by other means.

If you have any questions regarding the Gospel-Hump Wilderness Invasive Plant Management Project, please contact Megan Lucas, Project Leader, by telephone at (208) 935-4255, or by email at mdlucas@fs.fed.us. Information received in response to this solicitation, including names, addresses, email addresses, and phone numbers of those who provide input will be considered part of the public record and will be available for public inspection.

When completed, these documents will be available electronically on the Nez Perce–Clearwater National Forest webpage at: http://data.ecosystem-management.org/nepaweb/project_list.php?forest=110117

I appreciate your participation in the management of your public lands.

Sincerely,

CHERYL F. PROBERT
Forest Supervisor

cc: Mike Lopez, Dave Johnson, Aaron Miles, Sr

References Cited:

USDA Forest Service. 1987. Nez Perce Forest Plan. Grangeville, ID: USDA Forest Service, Nez Perce National Forest.

USDA Forest Service. 2009a. Selway-Bitterroot Wilderness invasive plants environmental impact statement. Orofino, ID: USDA Forest Service, Clearwater National Forest.

USDA Forest Service. 2009b. Selway-Bitterroot Wilderness invasive plants record of decision. Orofino, ID: USDA Forest Service, Clearwater National Forest.

Figure 1 – Gospel-Hump Wilderness Invasive Plant Management Project Vicinity

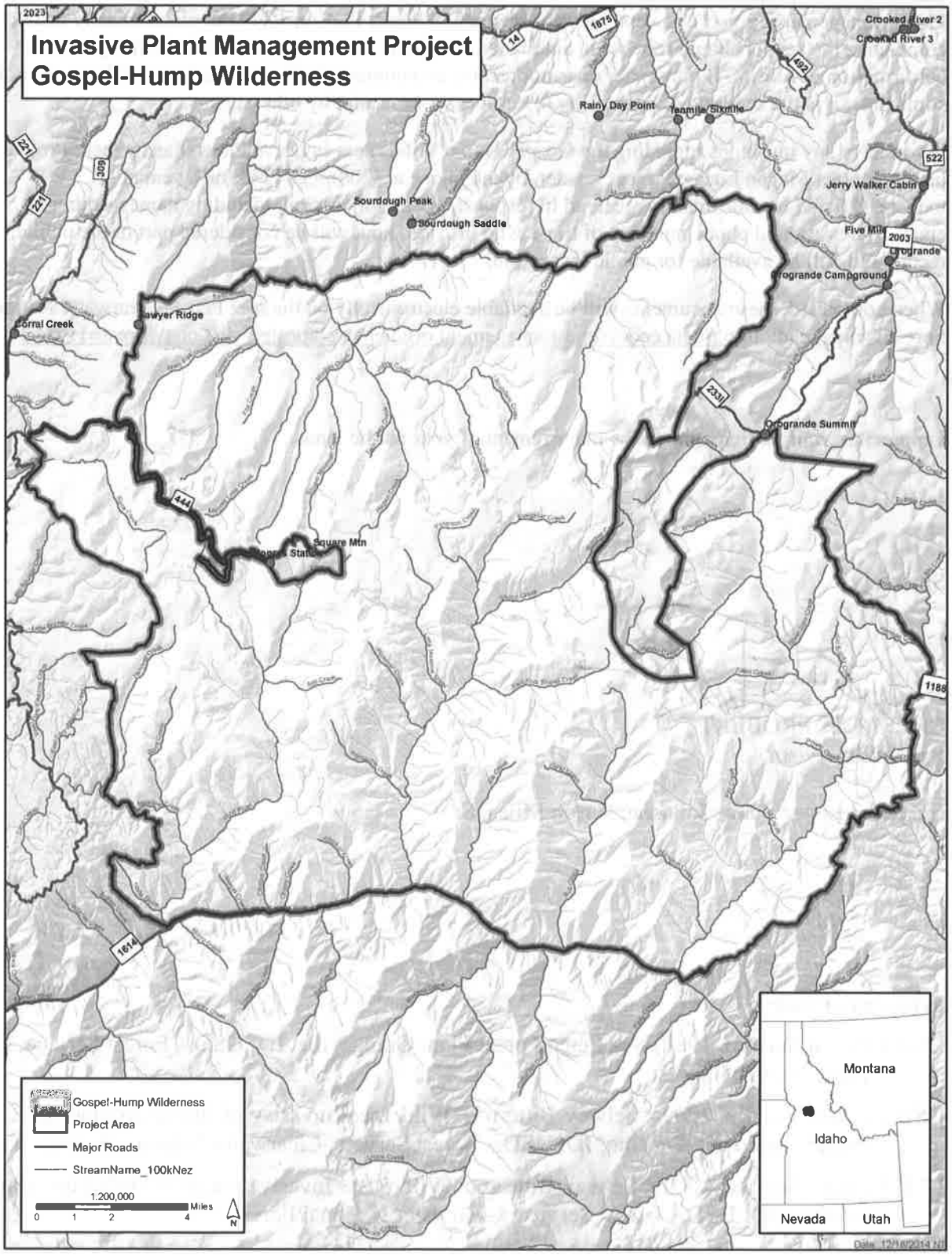
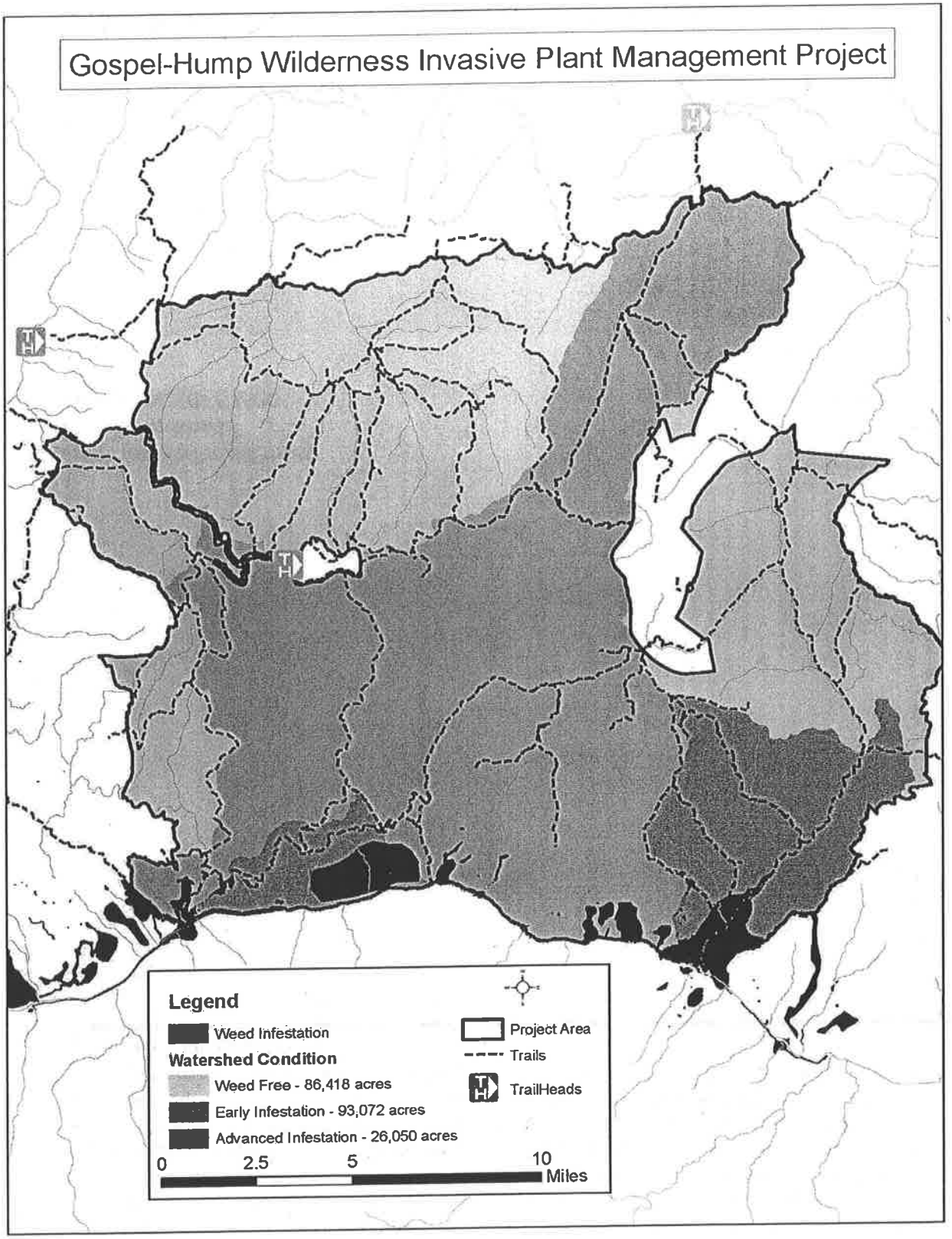


Figure 2. Watershed Condition – Weed Free, Early Infestation, and Advanced Infestation



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