USDA United States Department of Agriculture Forest Service Idaho Panhandle National Forests 3815 Schreiber Way Coeur d'Alene, ID 83815

File Code: 1950
Date: August 12, 2015

Friends and Neighbors of the Idaho Panhandle National Forests

I am writing to update you on the progress of the *Idaho Panhandle National Forests (IPNF) Noxious Weed Treatment Project*. It has been almost four years since we sent out our letter proposing this project (October 21, 2011). During this time, this project and others were put on hold so we could complete our forest plan revision effort. Since the signing of our revised 2015 Forest Plan in January of 2015 we have resumed our efforts on this project with an almost entirely new interdisciplinary team. They have reviewed past progress and made revisions to the purpose and need and proposed action. I would like to share with you the updates that have been made so you can reengage in this process and provide any feedback to these changes.

It is important to note that the intent of this project is not to propose weed management on the IPNF because we already have an existing program. This project focuses on updating and improving our weed management approach across the entire national forest.

Purpose and Need for Action

When I last wrote to you in 2011, the overall purpose for proposing this project was to reduce the undesirable impacts that noxious weeds and other non-native invasive plant species have on native plant communities and other ecological, social and economic values. The specific purposes for proposing this project included:

1. Reducing the likelihood that new non-native invasive plants species (i.e. potential invaders) are introduced and become established;
2. Preventing or limiting the spread of existing invaders and established non-native invasive plant species into areas with few or no infestations, and/or into areas where the potential to harm ecological, social, or economic values is high,
3. Rapidly responding to new, small or recently discovered infestations before they become well established, and respond utilizing the most efficient and effective treatment method(s);
4. Encouraging beneficial native vegetation and weed resistant plant communities and;
5. Increasing public and agency use of weed prevention practices and general awareness of weeds.

I have made an adjustment to the purpose for this project to better reflect our objectives. The purpose now focuses on a more uniform and consistent approach to invasive species management across the IPNF in compliance with national, state, and local policy laws and direction. Currently, each of the five ranger districts on the IPNF has an individual weed management plan that contains different requirements or authorizes different herbicides. A consistent approach to weed management across the IPNF would more effectively reduce the undesirable impacts that noxious weeds and other nonnative invasive plant species have on native plant communities and other ecological, social, and economic values. More specifically, this revised approach would:

1. Reduce the likelihood that new non-native invasive plant species become established;

2. Prevent or limit the spread of existing invaders and established non-native invasive plant species into areas with few or no infestations, and/or into areas where the potential to harm ecological, social, or economic values is high;
3. Rapidly respond to new, small or recently discovered infestations before they become well established, and respond using the most efficient and effective treatment methods; and.
4. Encourage beneficial native vegetation and weed resistant plant communities

I removed item number 5, "public and agency use of weed prevention practices and general awareness of weeds," from our proposed action because this is already part of our ongoing program and therefore does not need to be included in this project.

Similarly, the needs for the project have been revised to remove "the lack of a requirement for the use of certified weed-free feed on portions of the IPNF" because this need is also a prevention practice that would be better addressed separately from the weed treatment focus of this environmental impact statement. The revised needs for this project now include the following:

1) Inability to treat new infestations and new invaders: Some of the existing weed management plans on the IPNF either do not give weed managers the ability to treat new infestations that are found, or the plans are very restrictive in the number of acres of new infestations that may be treated. Also, some plans lack flexibility for weed managers to be able to treat nonnative invasive plants species that are not listed on state or federal noxious weed lists, but could threaten native species or important habitats.

Because of these limitations, weed treatment needed in areas not covered by the existing management plans is often planned, analyzed, and authorized under decisions for other forest management projects, making for an inefficient and piecemeal weed management approach. These situations illustrate the need for a new, forest-wide adaptive management strategy and an early detection-rapid response system,[1] which would better enable weed managers across the IPNF to quickly and efficiently take action against new nonnative invasive plant infestations and species that are found.

2) Inability to use new or different herbicides: Each of the five weed management plans on the IPNF authorizes the use of certain specific herbicides for treating nonnative invasive plants species. The lists of authorized herbicides that may be used differ between the various weed management plans, and range from a short list of four herbicides that may be used on the Bonners Ferry Ranger District, up to a longer list of eight that could be used on the Coeur d'Alene River Ranger District. Four of the five weed management plans indicate that if new herbicides are developed in the future, their potential use could be evaluated to determine if their impacts would fall within the scope of the existing environmental impact statements. However, due to the cost and time that would be necessary to conduct that additional environmental analysis for each of the four existing plans, none of the newer herbicides have been analyzed and approved for use.

---

[1] "Adaptive management" means monitoring treatments and making adjustments to those treatments when they aren't working or not very effective. "Early detection-rapid response" means having the ability to detect and treat new weed infestations quickly before they spread beyond what can be effectively controlled.

Some of the newer herbicides that are available for use are less expensive, more effective, and are safer to humans and the environment. Therefore, to have better "tools" to use for the treatment of nonnative invasive plants, there is a need to reevaluate herbicides available for use. In addition, as part of an adaptive management strategy, there is a need to develop an efficient process in which herbicides developed in the future could be reviewed and their use potentially authorized.

3) Inability to treat nonnative invasive plant species near water: Most of the existing weed management plans on the IPNF do not allow the use of herbicides within 10 feet of water regardless of the application method, the type of herbicide, or site conditions that are present. For invasive weed species such as knotweeds that often grow along streambanks and are extremely difficult and expensive to control with other methods, the inability to use herbicides may indirectly lead to the expansion of these infestations and undesirable consequences to aquatic and other resources. Since the existing weed management plans were developed, there have been some additional herbicide application methods such as wiping and stem injection, as well as more environmentally sensitive herbicides that have been shown to be very useful in locations near water. For these reasons, there is a need to reevaluate the necessity of having blanket restrictions on the use of herbicides near water.

Proposed Action

In general, our proposed action has not changed. Our proposed action is limited to nonnative invasive plant treatment activities, site restoration measures, and monitoring the effectiveness of the weed management program using an adaptive and integrated weed management strategy, which would include an early detection-rapid response approach across all lands of the IPNF administered by the Forest Service. Although this area is approximately 2.5 million acres, treatments would be focused in priority areas where nonnative invasive plant infestations threaten native vegetation and the functionality of important habitats. The proposed action includes herbicide, biological, physical and cultural treatment methods. Proposed control methods would be based on integrated pest management principles and methods known to be effective for each target species. This project is anticipated to last until conditions substantially change.

The original proposed action envisioned annual treatments of about 3,000 acres with the option of treating and additional 3,000 acres per year if additional funding were available and monitoring efforts identified the need. Because of the adaptive management strategy feature of the proposed action it is difficult to predict and analyze how many acres would be treated in the future within the different types of treatment locations. Therefore, our analysis and monitoring will focus on changes to densities of infestations and rates of spread instead of acres of treatment.

Issues

After reviewing comments received on our proposed action in 2011, we identified the following issues to carry forward in our analysis.

Issue 1: Potential Effect of Herbicide Use on Human Health:

Concerns were expressed that using herbicides to control weeds may have negative effects on human health. Comments related to this issue varied from a concern that was expressed over

the use of a specific herbicide to questions or concerns related to what procedures would be in place to prevent accidental herbicide spills and how public and private drinking water supplies would be protected. In addition, due to concerns of the potential harm that herbicides may have on human health or certain environmental elements, a number of respondents expressed sentiments that herbicide treatments should generally be used as a last treatment option.

Issue 2: Potential Effect of the Actions on Big Game, Other Wildlife, Native Plant Communities and Rare Plant Species, Aquatic Species, Soil Productivity, and Recreation:

Wildlife/big game and their habitat: Weed treatment methods may cause disturbance effects to some wildlife species and their habitat.

Native plant communities: Weed treatments utilizing herbicides to control nonnative invasive plant species can inadvertently affect non-target native vegetation.

Aquatic species and their habitat: The use of herbicides in or near riparian areas may impact water quality and aquatic species and their habitat.

Soils: Herbicide applications and other weed treatment methods can affect soil productivity.

Recreation: Treatment activities could affect visitor recreation experiences.

Issue 3: Economics

Costs of Various Weed Treatment Methods: Budgets for weed treatment are often limited; therefore, it is important to analyze the economic efficiency of the different weed treatment methods.

Alternatives

I am currently considering two alternatives in detail. A "Current Management Alternative" (or no action), which consists of the continued implementation of the five district weed decisions and a proposed action that would use an adaptive and integrated weed management strategy. The proposed action includes mitigation and design features that would address the concerns brought forward to date. For example, while there was a concern expressed over the use of Glyphosate for treating nonnative invasive plants, a design feature would be included in the environmental impact statement (EIS), which would limit formulations of Glyphosate to be used to those identified as low toxicity.

What is next?

The interdisciplinary team is currently analyzing how the alternatives may impact the environment. The EIS will include a description of the proposed activities and a disclosure of their environmental effects. A draft EIS is expected to be available for comment by the spring of 2016.

How do you stay involved?

All those who have expressed an interest in this proposal will receive notification of the 45-day comment period on the draft EIS.

If you wish to provide further information, or if you have questions, please contact team leader Karl Dekome at 208-765-7479 or *kdekome@fs.fed.us*.

Thank you for your interest in this project.

Sincerely,

MARY FARNSWORTH
Forest Supervisor