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January 21, 2015

Cheryl Probert
Supervisor, Nez Perce and Clearwater National Forests
903 3rd Street
Kamiah, ID 83536

RE: GOSPEL-HUMP WILDERNESS NOXIOUS WEEDS SCOPING LETTER, SENT VIA EMAIL TO: comments-northern-nezperce-red-river@fs.fed.us

Dear Supervisor Probert,

The following comments on the proposed Gospel-Hump weeds scoping letter are submitted on behalf Wilderness Watch and Friends of the Clearwater. We have several questions and concerns about the proposal.

**Wilderness**

We appreciate the danger to native ecosystems that noxious weeds pose. However, the first question that the agency must address is whether it is legal or appropriate ethically to spray herbicides and *introduce exotic species into the Wilderness under the guise of weed control*. The number one and overriding issue must be whether this weed control project is consistent with the Wilderness Act. Even before discussing issues of minimum required, the agency needs to evaluate whether a massive weed control program is even appropriate inside designated wilderness.

Preservation of wilderness character is the overriding mandate. Section 2(a) of the Wilderness Act is clear. So is the definition of Wilderness in section 2(c). Wilderness and the processes that define wilderness are to be "untrammeled" by humans. The Wilderness Act is, by intent, restrictive to human manipulation in Wilderness, regardless of the purpose. Exceptions are specifically addressed and narrowly defined. Where does an exception to introduce herbicides and non-native agents occur in the Wilderness Act?

As such, the agency needs to determine whether the activities proposed are even compatible with maintaining an "untrammeled" (uncontrolled, untethered) environment and preserving wilderness character. While the spread of undesirable, non-native weeds inside Wilderness is disturbing and shows a clear failure of agency administration of human recreational use in wilderness (and a failure in administration of weeds outside of wilderness), determining whether herbicide use, introductions of exotic species, and an aggressive and manipulative program of

going after weeds in the wilderness is appropriate should be appropriately evaluated in the NEPA document, which should be an EIS. The question is the cure worse than the disease needs to be asked.

The use of herbicides can have serious and unintended consequences. Introducing biological control insects is dangerous and contrary to the Wilderness Act and may even be worse as the use of herbicides in terms of unintended consequences. Herbicide use can be stopped whereas exotic species, once introduced are generally irreversible. Biological control insects have a real possibility of changing host plants, and therefore disturbing the natural balance between native species.

This distinct possibility of altering an evolving plant community balance, though use of herbicides and especially introduction of nonnative wildlife (usually insects) for weed control, goes against the Wilderness Act. Specifically, FSM 2323.31 (Management of Fish and Wildlife) states, "Objectives: 1. provide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist."

Also, FSM 2323.33a (Reintroductions) states, "Reintroduce wildlife species only if the species was once indigenous to an area and was extirpated by human induced events. Favor federally listed threatened or endangered species. Reintroductions should be made in a manner compatible with the wilderness environment."

The DEIS must also compare the harm to the wilderness character from the proposed intervention, particularly herbicides and exotic introduction, and the harm created by the influx or previously exotic organisms. Furthermore, the DEIS must show how this proposal is different than what occurs outside of wilderness. Since wilderness is set aside to allow natural processes to determine the character of the area, weed control, if it is even consistent with the Wilderness Act, must be different than what occurs on the national forests outside of designated wilderness.

Will the agency use the MRDG or MRA (Minimum requirements Decision Guide or Minimum Requirements Analysis) in this process. If none of the prohibited methods in section 4© would be used, is the MRDG the appropriate analysis tool?

**Prevention and Efficacy**

What is shown to be true is that prevention is the best way to control weeds. The scoping document pays little attention to this important aspect. If the agency were truly concerned about weeds in the Gospel Hump Wilderness it would consider implementing prevention measures such as the following:

> Require pelletized feed. It is extremely difficult if not impossible for rangers in the field to inspect hay brought into the Wilderness and to ensure that it is certified, “weed free.” Moreover, there is a great deal of doubt that all certified feed is in fact weed free. Pellets are a simple and proven-effective remedy. One example illustrates this problem. Ventenata grass is not currently considered a weed in terms of weed

free hay. It is a relatively recent invader that is mentioned in the scoping letter. Thus, weed-free hay could easily contain this grass seed and it could be brought into the Wilderness.

Prohibit stock grazing and/or use in areas that currently contain weeds until the weeds are eliminated. Stock grazing on weeds along trails or in meadows carry and deposit those weed seeds into other parts of the Wilderness. Even if horses are free of weeds when entering the Wilderness, they can still spread weeds if allowed to graze in areas that contain weeds. Spraying trail corridors does not resolve this concerns as stock graze more than just trail corridors. Indeed, stock grazing in areas with few weeds or without weeds will make those areas more vulnerable through grazing itself (which weakens the forage plants) and the potential for dispersal of weed seeds in the digestive system of the stock.

Require that all assigned camp sites and administrative sites, will be made weed free within 5 years, or those sites will be closed to public use until they are certified as weed free. Failure to keep a weed-free site would result in an automatic permit revocation.

Implement Wilderness-wide campsite standards that will eliminate bare ground that serves as a ready site for weed invasion.

Quarantine all animals for at least 48 hours prior to entering the wilderness. Having a quarantine corral established at all stock trailheads and have the trailheads staffed (especially during hunting season) and stocked with pelletized feed (weed-free hay isn't, people would be required to either bring in pelletized feed for the quarantine or purchase it from the campground host at the trailhead) is a start.

Require an inspection of all boats before entering the wilderness.

Again, if the agency is serious about attacking the noxious weeds, it will focus on preventative measures. To do otherwise makes all "back-end" controls futile. The reason weeds are a problem is that the agency has abdicated its duty by letting recreation interests drive wilderness administration rather than the mandates of the Wilderness Act.

The agency also has the obligation to evaluate the efficacy of the weed spraying programs in the nearby Wildernesses, specifically the Frank Church-River of No Return and Selway-Bitterroot Wildernesses. The attached photo shows the ineffectiveness of weed spraying in Bear Creek in the Selway-Bitterroot Wilderness. Specifically in this instance, the method of trail corridor spraying, most likely poorly timed, has accomplished almost nothing. While one species, spotted knapweed, is generally gone from the trail corridor (there are exceptions), two invasive plants, mullein and cheatgrass proliferate. Further, spotted knapweed is common beyond the corridor boundary. In essence, it is foolish to try and control weeds in this way. It trammels wilderness and does nothing for the natural plant communities. In fact, this has likely done more harm to the natural community within the trail corridor than the non-treated area outside.

Has the amount of herbicide use decreased as a result of the weed program in the Selway-Bitterroot or Frank Church-River of No Return Wildernesses or has it decreased because the agency found the program, as approved, is not working all that well? What about the use of exotic species? Have weed infestations in these Wildernesses increased, decreased or stayed the same?

Furthermore, how does spraying trail corridors prevent the spread of weeds by wildlife in the Wilderness? Are there controls where weed spraying in Wilderness has not taken place to compare the efficacy of this proposed program with the status quo and with a program of manual control only? What is the status quo in the Gospel-Hump Wilderness?

The question needs to be asked if weed control outside the wilderness, which includes the entire arsenal of herbicides with little or no constraints, were successful, there would be no threat to the Wilderness from invasive weeds outside the wilderness because weeds would already be controlled or eradicated. We question whether this program will have any positive effect given the reality of weed control outside the Wilderness. The scoping letter admits it has not worked.

**Other considerations**

One old and one new weed present serious threats because they can affect fire ecology: cheatgrass and ventenata grass. Efforts to control spotted knapweed may well give these two species a competitive advantage over knapweed. It appears they pose even greater ecological risks than does knapweed.. As such, a weed control program focused on knapweed may be counterproductive.

Other unintended consequences need to be considered. The introduction of non-native animal species (primarily insects) may threaten native species in the same genus or family as some of the weeds. Also, the introduction of invasive species to control knapweed has radically altered rodent ecology, as deer mice feed on the insects. You should already be aware of the research that has shown the imbalance in white-footed deer mice populations caused by the insects used to control spotted knapweed. This has negatively affected other rodents and increased Hantavirus.

How does the threat of weeds compare with other threats? The decline of anadromous fish in the Clearwater and Salmon drainages presents a problem of nutrient cycling and ecosystem function of an enormous magnitude. Recent research suggests salmon literally fertilized the entire Wilderness (bears which ate salmon provided nutrient rich scat outside of riparian zones). Weeds may be a result rather than a cause of ecosystem functioning and nutrient cycling collapse.

The agency allows (or allowed) the deliberate introduction of exotic species through fish stocking in the Gospel-Hump Wilderness lakes (though diminished from what it was). Are the impacts of exotic weeds as great as the harm to aquatic habitats from fish stocking, agency fire suppression, or domestic livestock grazing?

Monitoring of weed control programs from other wildernesses in the region needs to be included in the DEIS. Also, a monitoring program needs to be established for the proposal to determine what, if anything, works and what negative impacts/unintended consequences come from weed control. Monitoring must be incorporated into any program.

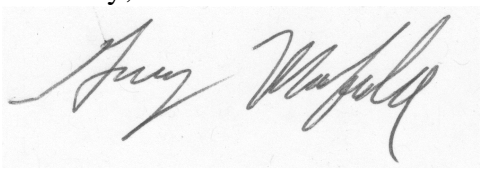
**NEPA**

As noted above, an EIS is needed for a program, which proposes widespread and deliberate manipulation of ecological processes in Wilderness. By definition, it is a significant impact.

Alternatives need to be evaluated, including an alternative that does not engage in widespread ecological manipulation of Wilderness. Only this alternative is consistent with keeping Wilderness untrammeled.

Please keep us updated on this project. Send a copy of the NEPA document to both Wilderness Watch at PO Box 9175, Missoula, MT 59807 and Friends of the Clearwater, PO Box 9241, Moscow, ID 83843.

Sincerely,



Gary Macfarlane

Selway-Bitterroot Wilderness Bear Creek Trail