

APPENDIX A Public Involvement

Public involvement is an integral and important part of conducting environmental analyses and subsequent documentation in this environmental impact statement. This Appendix serves to document the public involvement effort to date, and show how information acquired through outreach has been utilized in the preparation of this Final Environmental Impact Statement (EIS).

Invitation to Participate

Public involvement for this project was officially initiated with publication of a Notice of Intent to Prepare an Environmental Impact Statement (Figure A-1) in the August 28, 2002, edition of the Federal Register.

In late August 2002, the Invasive Plant EIS website (www.fs.fed.us/r6/invasiveplant-eis) was brought on-line. This website is a repository of information about invasive plants, their presence in the Pacific Northwest, integrated weed management and the EIS project schedule.

In mid-September we issued a news release (Figure A-2) to approximately 100 television, radio stations, and newspapers throughout Oregon and Washington State. Several telephone interviews were conducted, resulting in several radio and newspaper articles.

The Pacific Northwest Region as a whole did not have a mailing list of people and organizations interested in the invasive plant management program when the Invasive Plant EIS team was assembled in early 2002. We created our list by merging small lists from Forests and other administrative offices in the Region. The resultant list identified about 3,000 potentially interested people, organizations, businesses, tribes, and local, state and federal government agencies.

A letter to inform and identify interested public (Figure A-3) was sent out in late September 2002. In that letter we identified the problem, briefly explained our project and asked people for their thoughts on invasive plant management issues. In that same letter we invited people to attend public forums scheduled for Wenatchee, WA, Baker City, OR, and Roseburg, OR. A separate letter was sent to tribal leaders in the Pacific Northwest.

A second mailing was sent out in May 2003. This mailing (Figure A-4) was sent to the entire mailing list to confirm interest in the project and determine the extent of our printing needs.

Public Meetings and Outreach Activities

Other meetings took place in addition to the three public forums scheduled. The Team Leader, and a mix of team members participated in about 40 meetings with special interest groups, organizations, and representatives of local, state and federal agencies. A list of the meetings and dates are enclosed (Figure A-5). Many Pacific Northwest Region National Forests referred to this project in their quarterly newsletters.

Public Comment

The comment period for the public scoping letter was open for sixty days from September 18 through November 19, 2002. We continued to accept and process issues in letters received between November 20 and the completion of public comment analysis on December 12. During this time we processed 263 letters of comments. While most respondents replied by mail, about 50 people responded by email. Sixteen letters were received between December 13 and February 27, 2003. These letters were reviewed and copies were circulated among team members. Issues identified by the authors of these sixteen letters were not included in the formal analysis, though their issues were likely covered by other respondents, as there was a lot of overlap among comments.

Comments collected at the public forums in November were included in the comment analysis process.

Comment Analysis

The team decided to use an abbreviated method of content analysis to evaluate the comments. Comments provided by respondents were categorized into 11 topic categories, derived from the letters themselves (Table A-1).

Issue Identification

On December 16, 2002, the EIS Team met to discuss, evaluate, consolidate, and clarify issues. During this meeting the team considered the issues brought up by the public, organizations, other agencies and those of team members. Following two days of long discussion, and a few weeks of reflection and re-evaluation, the team completed the process of issue identification. The following list represents the final evaluation of relevant issues.

- Native Plant Communities
- Effectiveness of Treatment
- Invasive Plants and Land Management
- Human Health
- Wildlife
- Threatened and Endangered Species
- Aquatic Ecosystems
- Soils
- Tribes and treaty Rights
- Social Concerns
- Economics
- Congressional Designations
- Recreation

Additional information on the relevant issues and those issues considered to be irrelevant is located in Chapter 2.

Figure A-1 Notice of Intent

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Notices

Federal Register

Vol. 67, No. 167

Wednesday, August 28, 2002

This section of the FEDERAL REGISTER contains documents other than rules or proposed rules that are applicable to the public. Notices of hearings and investigations, committee meetings, agency decisions and rulings, delegations of authority, filing of petitions and applications and agency statements of organization and functions are examples of documents appearing in this section.

DEPARTMENT OF AGRICULTURE

Forest Service

Pacific Northwest Region Invasive Plant Project; Colville, Okanogan, Wenatchee, Mt. Baker-Snoqualmie, Olympic and Gifford Pinchot National Forests in Washington, and Columbia River Gorge National Scenic Area, Malheur, Fremont, Deschutes, Ochoco, Rogue River, Siskiyou, Mt. Hood, Siuslaw, Umpqua, Umatilla, Willamette, Wallowa-Whitman, and Winema National Forests in Oregon

AGENCY: Forest Service, USDA.

ACTION: Notice of intent to prepare an environmental impact statement.

SUMMARY: The USDA Forest Service will prepare an environmental impact statement (EIS) to amend Forest Plan direction to enhance our ability to protect native ecosystems from invasive, non-native plants. This action will build on the Region's existing program by improving our ability to prevent the introduction of invasive plant species, improve detection and rapid response to new infestations, and control of existing populations.

DATES: Comments concerning the scope of this analysis should be received no later than September 30, 2002.

ADDRESSES: Submit written comments to Natural Resource Staff; Invasive Plant Team, Forest Health Protection Group; Pacific Northwest Regional Office, P.O. Box 3623, Portland, OR 97208-3623.

FOR FURTHER INFORMATION CONTACT: Eugene Skrine, Team Leader, Invasive Plant Project, Pacific Northwest Regional Office, PO Box 3623, Portland, OR 97208-3623 or by calling (503) 326-4310.

SUPPLEMENTARY INFORMATION:

Need for the Proposal

Approximately 400,000 acres of National Forests and Grasslands are reported to be degraded in the Pacific

Northwest Region by infestations of invasive, non-native plants. This infestation has a high potential to expand and further degrade forest and grasslands. Invasive plants spread across landscapes, unimpeded by ownership boundaries. Infested areas represent potential seed sources for continuation of the invasion on neighboring lands. Infestations can be eliminated, controlled or exacerbated through utilization of specific management practices. Invasive species create a host of environmental and other effects, most of which are harmful to native ecosystem biodiversity and processes, including:

- Displacement of native plants.
- Reduction in functionality of habitat and forage for wildlife and livestock.
- Threats to populations of threatened, endangered and sensitive species.
- Alteration of physical and biological properties of soil, including productivity.
- Changes to the intensity and frequency of fires.
- High monetary cost of controlling/managing invasive plants.
- Loss of recreational opportunities.

Current regional management direction addressing invasive plant prevention, early detection, treatment, inventory and monitoring, and subsequent site restoration needs to be expanded and clarified. There is a critical need for the development of clear, and comprehensive Forest Plan standards and guidelines that allow more timely and more effective management and prevention practices for projects and programs in the Pacific Northwest Region.

Executive Order 13112 Invasive Species (Feb. 1999) provides direction that Federal agencies shall: (1) Prevent the introduction of invasive species; (2) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (3) monitor invasive species populations accurately and reliably; (4) provide for restoration of native species and habitat conditions in ecosystems that have been invaded. This EIS and subsequent site-specific NEPA analysis will implement this Executive Order.

The 1988 Vegetation Management EIS and Record of Decision (ROD), and the

1989 Mediated Agreement focused on competing vegetation in forest plantations. The ROD identifies prevention as the preferred strategy for vegetation management, and provides direction for analyzing prevention strategies for projects. However, neither the ROD, nor the Mediated Agreement, thoroughly addressed the numerous issues specific to preventing and treating invasive plants, nor do they identify standards or practices that could be applied to prevent invasive plants from becoming established.

The 1988 Record of Decision (ROD) specified and specifically limited the type and range of tools available for the treatment of competing and unwanted vegetation. Neither the ROD nor the Mediated Agreement provides a mechanism for adapting its requirements and adopting new technologies. The use of biological agents and prescribed fire as control mechanisms were not fully examined. Herbicides approved for use in the ROD were developed before 1980. Today, new herbicides are available that appear to be more effective on target plants, and potentially less hazardous to humans and wildlife.

Given the seriousness of the current invasive species situation, National Forest managers need more operational flexibility with reduced process, greater cost-effectiveness and timely responsiveness, without increasing environmental risks. A new roadmap for prevention and site restoration, as well as a new and expanded toolbox, including; biological, fire, mechanical, manual, cultural, and chemical tools, are critical to successfully managing our invasive plant problem. New Forest Plan standards and guidelines will significantly enhance our ability to deal effectively with this threat to the integrity and productivity of the National Forests in the Pacific Northwest Region.

Proposed Action

The USDA Forest Service, Pacific Northwest Region, proposes to amend Forest Plan direction to enhance our ability to protect native ecosystems from invasive, non-native plants. This action will build on the Region's existing program by improving our ability to prevent the introduction of invasive plant species, improved detection and rapid response to new infestations, and

control of existing populations in a cost-effective and environmentally sound manner. In addition, this action will provide for restoration of native species and habitat in ecosystems that have been invaded. The proposed action would result in amendments to existing National Forest Land and Resource Management Plans, which earlier incorporated decisions made through the 1988 Record of Decision/FEIS for Managing Competing and Unwanted Vegetation, and the 1989 Mediated Agreement. This action would replace the portions of the Record of Decision and Mediated Agreement that addresses invasive species.

Proposed Scoping

Public participation is an important part of the analysis. The Forest Service is seeking information, comments, and assistance from Federal, State and local agencies, tribes, and other individuals or organizations who may be interested in or affected by the proposed action. Comments submitted during the scoping process should be in writing. They should be specific to the action being proposed and should describe as clearly and completely as possible any issues the commenter has with the proposal. This input will be used in preparation of the draft EIS.

In addition to this scoping, the public may visit Forest Service officials at any time during the analysis and prior to the decision. To facilitate public participation additional scoping opportunities will include: a scoping letter, public meetings (dates and locations yet to be determined), newsletters, and a Web site with address (<http://www.fs.fed.us/r6/invasiveplant-eis>).

Preliminary Issues Identified to Date

Preliminary issues that have been identified are:

- Invasive plant infestations are expanding and threatening the health and stability of native plant communities and ecosystems.
- The application of herbicides, as one potential treatment method, may pose risks to human health and the environment, including soil, water, native plants, fish, and wildlife resources.

Alternatives Considered

The No Action alternative will serve as a baseline for comparison of alternatives. This alternative will be no change from current management of the Forests and will be fully developed and analyzed. The proposed action, as described above will be considered as an alternative. Additional alternatives

may be developed around the proposed action to address issues identified in the scoping and public involvement process.

Estimated Dates for Draft and Final EIS

The draft EIS is expected to be filed with the Environmental Protection Agency (EPA) and to be available for public comment by July 2003. The comment period on the draft EIS will be 45 days from the date the EPA publishes the notice of availability in the **Federal Register**.

The Forest Service believes, at this early stage, it is important to give reviewers notice of several court rulings related to public participation in the environmental review process. First, reviewers of the draft EIS must structure their participation in the environmental review of the proposal so that it is meaningful and alerts an agency to the reviewer's position and contentions. *Vermont Yankee Nuclear Power Corp. v. NRDC*, 435 U.S. 519.553 (1978). Also, environmental objectives that could be raised at the draft EIS stage but that are not raised until after the completion of the final EIS may be waived or dismissed by the courts. *City of Angoon v. Hodel*, 803 F. 2d 1016, 1022 (9th Cir. 1986) and *Wisconsin Heritage, Inc. v. Harris*, 490 F. Supp. 1334 (E.D. Wis. 1980). Because of these court rulings, it is very important that those interested in this proposed action participate by the close of the 45-day comment period; so that substantive comments and objections are made available to the Forest Service at a time when it can meaningfully consider them and respond to them in the final EIS.

To assist the Forest Service in identifying and considering issues and concerns on the proposed action, comments on the draft EIS should be as specific as possible. It is also helpful if the comments refer to specific pages or chapters of the draft statement. Comments may also address the adequacy of the draft EIS or the merits of the alternatives formulated and discussed in the statement. Reviewers may wish to refer to the Council on Environmental Quality Regulations for implementing the procedural provision of the National Environmental Policy Act (40 CFR 1503.3) in addressing these points.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action and will be available for public inspection. Comments submitted anonymously will be accepted and considered; however, those who submit anonymous

comments may not have standing to appeal the subsequent decision under 36 CFR part 215. Additionally, pursuant to 7 CFR 1.27(d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the request is denied, the agency will return the submission and notify the requester that the comments may be resubmitted with or without name and address within a specified number of days.

Comments on the draft EIS will be analyzed, considered, and responded to by the Forest Service in preparing the final EIS. The final EIS is scheduled to be completed in December 2003. The Regional Forester for the Pacific Northwest Region is the responsible official and as such will consider comments, responses, environmental consequences discussed in the final EIS, and applicable laws, regulations, and policies in making a decision regarding this proposed action. The responsible official will document the decision and rationale for the decision in the Record of Decision. It will be subject to Forest Service Appeal Regulations (36 CFR part 215).

Dated: August 21, 2002.

Richard W. Sowa,

Acting Deputy Regional Forester.

[FR Doc. 02-21882 Filed 8-27-02; 8:45 am]

BILLING CODE 3410-11-M

BROADCASTING BOARD OF GOVERNORS

Sunshine Act Meeting

DATE AND TIME: September 10, 2002; 2 p.m.-5 p.m.

PLACE: Cohen Building, Room 3321, 330 Independence Ave., SW., Washington, DC 20237.

CLOSED MEETING: The members of the Broadcasting Board of Governors (BBG) will meet in closed session to review and discuss a number of issues relating to U.S. Government-funded non-military international broadcasting. If necessary, the Board will reconvene the following day to conclude its business. They will address internal procedural, budgetary, and personnel issues, as well as sensitive foreign policy issues

Figure A-2 News Release**News Release**

USDA Forest Service
Pacific Northwest Region



Contacts: Rex Holloway, 503-808-2241
Gene Skrine, 503-326-4310

USDA Forest Service takes on invasive weed challenge

PORTLAND, September 17, 2002 - The Pacific Northwest has a serious invasive plant problem. The USDA Forest Service is looking at integrated ways to prevent future infestations, manage existing problems, and restore affected sites, says acting Regional Forester Linda Goodman.

Goodman notes approximately 400,000 acres of national forests and national grasslands in the Pacific Northwest are affected by infestations of invasive, non-native plants.

Most invasive plant species are introduced to North America from Europe or Asia. They may come accidentally, or they may have been brought in on purpose. Examples of accidental introduction include the transport of seeds or plants in the ballast of ships, in the fleece and hair of livestock, in clothing, and as contaminants in seed lots. Intentional introductions are made for reasons including medicine, dyes, forage, erosion control and ornamental plants, to name a few.

“For the purpose of this project, invasive plants (aka noxious weeds or exotics) are those plants that harm natural resources or the people who enjoy them,” Goodman adds. “To date approximately 95 invasive plant species have been reported on national forest lands in Oregon and Washington.”

To address it, the Forest Service in the Pacific Northwest has chartered a team to prepare an environmental impact statement that looks at integrated ways to deal with the invasive plant species problem.

“This environmental impact statement project will give us a clearer and more comprehensive set of standards and guidelines for our Forest Plans, and allow us to be more effective in preventing and more timely in controlling invasive species,” says team leader Gene

Skirine. “Prevention, early detection, early treatment and restoration are our best and most cost-effective tools for combating invasive plants.”

Team members will consider a variety of prevention and treatment strategies. Among the possibilities are biological controls (insects that feed on undesirable plants), herbicides, cultural measures such as hand pulling plants, and prevention practices (for example, cleaning equipment or assuring that only weed-free hay goes into uninfested areas).

When done, the resulting environmental impact statement will be the basis for changes to the Forest Plans for national forests in the Pacific Northwest. Public forums will be part of that process, says Skirine. The Forest Service will host three invasive plant forums in Oregon and Washington communities this fall.

“Our team expects to be done by the end of 2003,” says Skirine. “Time is of the essence,” he notes. “These infestations have a high potential to expand and further degrade national forests and grassland through loss of wildlife habitat, loss of rare or endangered plants, decreased biodiversity, degradation of water quality, and loss of recreation opportunities.”

Sidebar 1

Where to find out more...

Additional information about the environmental impact statement and the invasive plant problem can be found at <http://www.fs.fed.us/r6/invasiveplant-eis> by contacting Gene Skirine at 503-326-4310, or by writing the team at:

Invasive Plant Project, USDA Forest Service, PO Box 3623, Portland, OR 97208

The dates and locations for invasive plants forums are as follows:

Location	Host Forest	Date
Wenatchee, Washington Wenatchee Conference Center, North Ballroom	Okanogan/Wenatchee National Forest	November 13, 2002 6:30 pm – 9:30 pm
Baker City, Oregon Best Western Sunridge Inn	Wallowa-Whitman National Forest	November 16, 2002 10:00 am – 4:00 pm
Roseburg, Oregon Roseburg Public Library	Umpqua National Forest	November 20, 2002 6:30 pm – 9:30 pm

Sidebar 2**What are invasive plants... and what's the big deal?**

- Invasive species are distinguished from other unwanted plants by their ability to spread (invade) into native ecosystems.
- In the western United States, invasive species have been spreading at a rate of about 4,600 acres per day on federal lands.
- Oregon State Department of Agriculture estimates indicate that existing and potential invasive plants are costing Oregon citizens a total of about \$100 million per year.

Invasive species are typically non-native, however, not all non-native species are invasive. The terms alien and exotic are used interchangeably to describe an unwanted plant that has been introduced to an environment.

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Figure A-3 Inform Public Letter

File Code: 1950/2080

Date: September 18, 2002

Dear Interested Citizen

We have a serious problem with the establishment and spread of invasive plants (AKA noxious weeds and exotics) on National Forests and Grasslands in the Pacific Northwest Region. We need your help as we look for ways to more effectively prevent the establishment of invasive plants, and to control and restore areas that are currently infested.

In recent years invasive plant populations have skyrocketed all over the country. The problem has been particularly bad throughout the West. Public lands here in the Pacific Northwest Region are no exception. Approximately 400,000 acres of National Forests and Grasslands are currently infested with invasive, non-native plants. These infestations have the potential to expand at the rate of 8-12 percent per year.

Invasive plants threaten to permanently degrade hundreds of thousands of acres of wildlife habitat, eliminate rare and endangered plants, impair water quality and watershed health, and adversely affect a wide variety of other resource values. Invasive plants spread across landscapes, unimpeded by ownership boundaries. These infested areas represent potential seed sources for continuation of the invasion on neighboring lands. Infestations can be prevented, eliminated, controlled or made worse by the use of specific management practices.

Our management direction addressing invasive plant prevention, early detection, treatment, inventory and monitoring, and subsequent site restoration needs to be expanded and clarified. There is a critical need for the development of clear, and comprehensive Forest Plan standards and guidelines that allow for more effective prevention and timely management.

I have assigned an interdisciplinary team to conduct an environmental analysis to evaluate invasive plant prevention practices and management strategies relating to invasive plants in our Region. The team's analysis will be documented in a Region-wide environmental impact statement.

Our question to you is: **How can we improve our management of the Region's forests and grasslands to 1) prevent the establishment of invasive plants; 2) detect and respond rapidly to control populations of invasive plants in a cost-effective and environmentally sound manner; 3) restore native plant communities and habitat conditions in ecosystems that have been invaded.**

Your issues and concerns will be important to us as we develop the scope of the project, analyze the situation and the data, develop alternatives and select a preferred alternative. We welcome

your comments anytime during the project. However, your comments would be most helpful if received within the next 60 days. A comment form is attached for your use. A draft document will be published in mid summer 2003, followed by a 45-day public comment period.

The interdisciplinary team will be conducting a series of “Invasive Plant Forums” this fall as part of our project scoping. The purpose of the forums is to encourage a dialogue about the prevention and control of invasive plants, and the restoration of native plant communities that have been invaded. We encourage your participation at the forums.

Location	Host Forest	Date
Wenatchee, Washington Wenatchee Conference Center, North Ballroom	Wenatchee/Okanogan National Forest	November 13, 2002 6:30 pm – 9:00 pm
Baker City, Oregon Best Western Sunridge Inn	Wallowa-Whitman National Forest	November 16, 2002 10:00 am – 4:00 pm
Roseburg, Oregon Douglas County Public Library	Umpqua National Forest	November 20, 2002 6:20 pm – 9:00 pm

We have developed a website for your convenience, which contains information about our project, as well as updates on the time and location of our forums and other events. The website address is: <http://www.fs.fed.us/r6/invasiveplant-eis>. Instructions for providing comments via email are available on the website.

To discuss the project or arrange for meetings please contact Eugene Skrine, Team Leader, at 503-326-4310 or by mail at the following address.

Invasive Plant Project
 USDA Forest Service
 PO Box 3623
 Portland, OR 97208

We look forward to your participation in this project.

Sincerely,

/s/ *Richard Sowa* (for)
 LINDA GOODMAN
 Acting Regional Forester

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Figure A-4 Confirm Printing Needs

USDA Forest Service
Invasive Plant EIS Team
EGWW Room 585
PO Box 3623
Portland Oregon 97208

RE: Draft Environmental Impact Statement, Invasive Plants

Greetings:

In July 2003, USDA Forest Service anticipates publishing and distributing a DRAFT Environmental Impact Statement (DEIS) for prevention and control of invasive plants in the Pacific Northwest.

We anticipate the hard copy of the DEIS and Appendices to be quite large and we need your help in effectively sharing information contained in DEIS, reducing expenses and saving paper.

Please check the box that describes how you would like to receive a copy of the DEIS and the preferred format.

Hard copy format:

- DEIS only
- DEIS plus Appendices
- Summary only

Electronic format:

- CD Rom
- I will review on the Internet or at my local Forest Service office.
- Do not send a copy and remove me from the mailing list.

If you wish to remain on our mailing list and receive the DEIS in the format you requested, **please fold, secure and return to the mailing address below before June 2, 2003.**

If we do not receive a response, we will consider you are no longer interested in the project and will remove your name from our mailing list.

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Figure A-5 Meetings w/Public, Groups, Other Government Agencies

Date	Person or Group	Location
11-27-01	Bette Coste, Oregon Dept of Trans.	Portland
03-11-02	Les McConnell, Tribal Relations	Portland
04-12-02	Terry Witt, Oregonians of Food and Shelter	Portland
04-17-02	Alan Holt, The Nature Conservancy	Portland
04-30-02	George Stankey, PNW	Portland
05-01-02	R6 Range Conservationists	Pendleton
05-09-02	Forest Stewards Guild	Wilsonville
05-21-02	Washington State Weed Board	Vancouver
06-03-02	Northwest Coalition for Alternatives to Pesticides	Eugene
06-13-02	Douglas Johnson, Oregon State Univ.	Corvallis
07-08-02	Joanna Cline	Portland
07-11-02	Eric Coombs, Oregon Dept. of Agri.	Hood River
07-23-02	Wallowa-Whitman NF	La Grande
08-12-02	Jerry Asher, BLM (retired)	Portland
08-28-02	National Park Service/ US Geological Survey	Portland
09-17-02	Umatilla National Forest	Pendleton
09-24-02	Deschutes NF./Blue Mtn Biodiversity	Bend/Deschutes NF
09-26-02	Regional Ecosystem Office (REO)	Portland
10-08-02	Stan Loop, Eastern Oregon Public Relations Project	Portland
10-16-02	R6 Forest Supervisors and Deputies	Portland
10-17-02	Skamania County Weed Board	Skamania
10-29-02	Mandy Tu, The Nature Conservancy	Portland
11-07-02	Washington State Weed Conference	Yakima
11-13-02	Invasive Plant Public Forum	Wenatchee
11-16-02	Invasive Plant Public Forum	Baker City
11-20-02	Invasive Plant Public Forum	Roseburg
12-04-02	John Day/Snake River RAC	Pendleton
01-07-03	Oregon Equestrian Trails	Sunnyside
01-22-03	NOAA Fisheries	Portland
	U.S. Fish and Wildlife Services	
01-24-03	Will Lackey, ODOT	Portland
01-29-03	R6 Weed Coordinators Workshop	Wilsonville
02-20-03	Tim Butler, Oregon Dept. of Agri.	Portland
	Greg Haubrich, Washington Dept of Agri.	
03-07-03	Oregon Equestrian Trails	Gresham
03-17-03	Umatilla/Wallowa-Whitman/Malheur NFs	Pendleton
03-20-03	Washington State Weed Coordinators Association	Lake Chelan
04-05-03	Oregon Equestrian Trails	Canby
04-22-03	Caroline Cox, NCAP	Portland
06-04-03	R6 Forest Supervisors and Deputies	Bend
06-04-03	Deschutes and Ochoco NF	Bend
	Botanists/Planners/Silviculturists	
06-12-03	Caroline Cox, NCAP	Portland
06-20-03	Oregon Cattlemen's Association	Klamath Falls

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Table A-1 Comment Analysis

**Issues clarified from the scoping letters for the Invasive Plants EIS
(version 7/20/03)**

Comments Related to Human Health Effects

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Concerned about risks to human health as a result of herbicide use in the Proposed Action.	Yes	57, 40, 80, 76, 66, 154, 165, 166, 167, 168, 169, 172, 174	These comments are addressed in Issue #4 and associated analysis. Alternative B was developed to reduce risk of human health impacts.
Many supposed inactive/inert ingredients within herbicides included in the Proposed Action can pose serious threats	Yes	18, 131, 154, 168, 181, 13, 177, 178, 182, 183	These comments are addressed in Issue #4 and associated analysis. Alternative B was developed to reduce risk of inactive/inert ingredients.
Request full disclosure on effects of hormone disruption on humans from chemicals included in the Proposed Action.	Yes	131	This comment is addressed in Issue #4 and associated analysis. Alternative B was developed to reduce risk of hormone disruption.
Health of people who live near forestlands may be adversely affected by herbicide spraying.	Yes	174	These comments are addressed in Issue #4 and associated analysis. Alternative B was developed to reduce risk of human health impacts.
When composing chemical vs. manual weed control also analyze the economic costs to pesticide applications in terms of health risks	No	83	This comment relates to an indirect economic impact, assuming increased health risks from pesticides. There is no evidence that the Proposed Action or any other alternative has the potential to measurably increase health care costs.
EIS should cover the cumulative and synergistic effect of chemical herbicide application.	Yes	183	Analysis for Issue #4 addresses cumulative effects from herbicides on human health.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
<p>Spraying toxic chemicals across public lands is not a very pleasant thought and must be avoided at all costs.</p> <p>We do not want herbicides in our food chain, water supply, or the air we breathe.</p> <p>One of the worst ways to imbalance nature is to use herbicides. Another is clear-cutting.</p>	<p>No</p>	<p>184, 254, 260</p>	<p>These comments reflect value judgments. These comments are factored indirectly into “social acceptability” analysis for Issue #1.</p>

General Comments About Pesticides and Herbicides

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
The Forest Service needs to establish goals for reducing agency use of pesticides.	No	181	This comment is not about the Proposed Action and is outside the scope of this analysis.
General concerns about the use of herbicides and the effects on the ecosystem.	No	72, 176, 57, 113, 66, 229, 225, 174, 169, 168, 10, 18, 131, 165, 167	This comment is too vague to analyze. Risk assessments for various herbicides were evaluated for potential effects on non-target species, wildlife, human health and aquatic organisms.
Herbicide use may aggravate the problem rather than solve it.	Yes	230	This comment is addressed through disclosure regarding herbicide resistance, discussed specifically under Issue #1.
Do not use aerial applied herbicides; too risky.	Yes	17, 196, 229, 219, 233, 92, 119, 143, 168, 188, 225, 228	An alternative that completely eliminates aerial use of herbicide was considered but dismissed because it could not meet the purpose and need in certain cases (see Chapter 2 for more information). Alternative B was developed to reduce the acreage of annual spray.
Set a quantified target for the reduction in use of herbicides on NF's.	Yes	18, 143, 167, 170, 184, 186, 188	Alternative B was developed to reduce reliance on herbicides in the invasive plant management program.
Always try to use the least toxic method of control.	Yes	252	Alternative B was developed to only include the least toxic methods of control.

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Comments About Invasive Plant Prevention and Treatment Effectiveness

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Grazing/overgrazing is cause of invasive plant problem. The Proposed Action does not go far enough to stop or reduce grazing on NF land.	Yes	121, 148, 98, 225, 226, 233, 12, 17, 18, 23, 25, 26, 29, 31, 96, 97, 122, 153, 14, 42, 57, 81, 74, 77, 56, 60, 116, 118, 112, 111, 102, 123, 154, 137, 105, 164, 165, 168, 169, 170, 171, 172, 173, 177, 180, 181, 182, 150, 138, 183, 186, 188, 189, 194, 195, 196, 198, 244, 247, 216, 219, 184,	All alternatives consider effects of grazing on invasive plants when determining allotment management plans and invasive plant treatment plans. Alternative B includes a standard to limit grazing that may increase spread of invasives. Analysis for Issue #1 addresses effectiveness of Prevention Standards (including grazing restrictions) in reducing spread. Analysis for Issue #5 discusses effects on land uses, including grazing, from the Prevention Standards.
Livestock are vectors for weed transport.	No	121	This is a general comment and not related to the effects of the Proposed Action.
Use weed-free hay/pellets before/while on NF	Yes	57, 105, 248, 26, 98, 54	Alternative B was developed to require weed-free feed on all acreage of National Forest in Region Six. The other alternatives apply this standard to fewer acres. Analysis for Issue #1 addresses effectiveness of Prevention Standards (including weed-free feed requirements) in reducing spread. Analysis for Issue #5 discusses effects on land uses, including weed-free feed requirements, from the Prevention Standards.
Encourage diverse native plant communities	No	76, 189, 196, 44, 97	This comment is not related to the effects of the Proposed Action.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Use manual control techniques whenever possible; not herbicides.	Yes	23, 57, 76, 153, 164, 170, 171, 173, 177, 178, 181, 182, 183, 186, 187, 188, 191, 193, 196, 198, 200, 224, 225	Alternative B was developed to respond to this comment.
Off-road vehicles spread weeds. Reduce/study ORV use. Restrict off-road vehicles to designated trails, roads, or controlled areas.	Yes	57, 77, 56, 1, 100, 21, 164, 168, 169, 170, 171, 173, 177, 181, 182, 183, 186, 188, 189, 194, 195, 196, 198, 244, 216, 219, 222, 18, 25, 96, 143, 138, 154, 123, 128, 48	Alternative B was developed to reduce OHV use that may lead to invasive plant spread on National Forests in Region Six. Analysis for Issue #1 addresses effectiveness of Prevention Standards (including OHV use restrictions) in reducing spread. Analysis for Issue #5 discusses effects on land uses, including OHV area closures, from the Prevention Standards.
Require mandatory equipment cleaning before equipment enters weed free areas and as equipment leaves weed-infested areas.	Yes	01, 27, 60, 147, 243, 233	Alternative B was developed to address this comment. The effectiveness of the alternatives in reducing the rate of spread of invasive plants is discussed under Issue #1.
Restore/reseed disturbed areas to prevent weeds	Yes	57, 60, 13, 36, 37, 136, 152	All alternatives include restoring/reseeding disturbed areas to prevent weeds.
Study weed dispersal. Prevent movement of weeds from infested to non-infested areas.	No	80, 70 8, 65, 178, 60, 103, 106, 162, 216, 17, 25, 29,	This comment is reflected in the purpose and need for action.
Close areas and exclude operators/users where weed problems persist; including roads that have been/are major weed vectors.	Yes	01, 07	Alternative B was developed to respond to this comment. The effectiveness of the alternatives in reducing the rate of spread of invasive plants is discussed under Issue #1.
Need to pay close attention to closed roads limited use roads, and other disturbed areas; not just focus on primary roads.	Yes	02	Alternative B was developed to respond to this comment. The effectiveness of the alternatives in reducing the rate of spread of invasive plants is discussed under Issue #1.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
<p>Keep all livestock penned-up for at least two or three days prior to turn out on NF pastures. Limit, or more closely manage, grazing in sensitive areas, riparian areas; excessive grazing can damage native plant communities and bring in invasive seeds.</p>	<p>Yes</p>	<p>03, 27, 60, 116, 180, 07, 17, 11, 216, 244</p>	<p>All alternatives would require consideration of invasive plant management in annual permits. The effects on range management are discussed under Issue #5.</p>
<p>Use bio controls whenever possible.</p>	<p>Yes</p>	<p>14, 60, 66, 71, 72, 83, 90, 91, 102, 145, 180, 209, 220, 246</p>	<p>All alternatives provide management direction for biological control of invasive plants.</p>
<p>Use grazing animals, particularly geese, cows, sheep, and goats, to help control the invasive plant problems.</p>	<p>Yes</p>	<p>20, 126, 56, 61, 79, 92, 105, 112, 53, 133, 130, 151, 157, 195, 201, 209, 214, 243</p>	<p>All alternatives provide management direction for cultural control of invasive plants.</p>
<p>Discontinue grazing permits.</p>	<p>No</p>	<p>21, 23, 24, 11, 90</p>	<p>The suggestion to discontinue grazing permits is beyond the scope of this EIS. All alternatives require consideration of invasive plants in allotment management plans.</p>
<p>Limit soil disturbance associated with all forest activities.</p>	<p>No</p>	<p>24, 140, 216</p>	<p>Limitations on soil disturbance already exist through the Regional Guide and individual Forest Plans.</p>
<p>Conduct regular surveys to detect weeds early.</p>	<p>No</p>	<p>219, 232</p>	<p>This comment is not related to the effects of the Proposed Action.</p>
<p>It's impossible to stop weeds, so don't try. The spread of plants is normal. The Garden of Eden will not remain the same no matter how much taxpayer money you throw at it. Attempting to control invasives is costly. Nature will cure itself. Don't waste working on unrealistic projects, i.e. bull thistle, St. John wart, they are too ubiquitous.</p>	<p>No</p>	<p>9, 14, 28, 239, 60</p>	<p>These comments are value judgments that are outside the scope of this EIS. Reducing the spread of invasive plants is part of the purpose and need for action.</p>

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Employees in field should pull weeds. That would reduce spread.	No	94	The labor force to be used to treat invasive plants is outside the scope of this EIS.
Don't allow horses, mules, or other pack animals on NF.	No	105	This suggestion is outside the scope of this EIS. The <i>effects</i> of pack stock are an issue that would be addressed through use of weed-free feed.
Treat roadsides and rock pits and power line right-of-ways.	Yes	192	All alternatives include standards for treatment of vectors of invasive plant spread. Effectiveness of the alternatives is discussed under Issue #1.
The Proposed Action does not address the major issue of vehicle use on logging roads, instead looks for technical solutions to try to fix the damage after it has occurred.	Yes	226	Prevention Standards in Alternative B were developed to address this issue. Effectiveness of the alternatives in reducing invasive plant spread is discussed under Issue #1. Effects on land uses are discussed under Issue #5.
Grazing should be eliminated altogether. Raising grazing fees closer to market rates would likely decrease this practice.	No	229	This is a value judgment that is beyond the scope of this EIS.
The environmental preservation associated with the Proposed Action may affect proper forest management.	Yes	85, 86, 145	This comment is addressed under Issue #5, which discusses effects of prevention standards on land management and use.
Concern with timely intervention. (Why wait so long).	No	86, 78, 34, 39, 14, 20, 45, 155, 107, 148, 121, 124, 127	The NEPA process itself takes a certain amount of time. This is not an issue that can be addressed in the EIS.
Streamline EIS process for quicker response time. Concern with overcoming "bureaucratic regulations" to accomplish work on the ground.		71, 20, 45, 155, 7, 45, 91	
Time spent in excessive studies allows weeds to spread.			
The Proposed Action may not be adaptable enough to switch to more effective and environmental friendly "chemicals" if found.	Yes	78, 34, 124	Theses comments were addressed by the alternatives, thru the development of the standards and the underlying adaptive nature of IPM.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Create a weed control department in charge of control and prevention.	No	02	This comment is outside the scope of this EIS. Organizational decisions are not subject to NEPA.
The Proposed Action may not go far enough using chemical weed treatment on FS roadsides infested with spotted knapweed, meadow hawkweed and others.	Yes	91	Alternative D was developed to address this comment. The effectiveness of each alternative in reducing spread of invasive plants is discussed under Issue #1.
Close roads that are serving as weed vectors and limit construction of new roads.	Yes	07, 258	Prevention Standards in Alternative B were developed to address this issue. Effectiveness of the alternatives in reducing invasive plant spread is discussed under Issue #1. Effects on land uses are discussed under Issue #5.
The Proposed Action may not provide for rapid/early treatment with herbicides.	Yes	07, 12, 52, 78, 89, 99, 190, 221, 235	Alternative D was developed to address this comment. The effectiveness of each alternative in reducing spread of invasive plants is discussed under Issue #1.
Place a bounty on the most damaging of the invasive plants and pay cash for bagfuls of them.	No	08, 132	Use of cash incentives to affect an outcome is beyond the scope of this EIS and is not subject to NEPA.
Use integrated weed management in assessing prioritizing and treating infestations.	Yes	17, 21, 24, 96, 141, 178, 245, 234	All alternatives use integrated weed management concepts in assessing and prioritizing infestations. See all EIS Chapters for discussions about integrated weed management.
Require weed free certified hay for livestock on federal lands.	Yes	17, 60, 204, 245	Alternative B was developed to require weed free feed on all acreage of NF within Region Six.
Must have interagency cooperation.	No	20, 155, 54	This comment is reflected in the purpose and need for action.
Allow local Govt. decision-making authority.	No	142, 126	Processes for local, state and federal decision-making are beyond the scope of this EIS.
Become more aggressive on control.	Yes	144	Alternative D was developed to respond to this comment.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Amend the forest plan to provide strong standards and guidelines that help forests address prevention, treatment, restoration, and management of noxious weeds.	Yes	155, 49, 167	This comment is addressed through prevention and treatment/restoration standards in all alternatives. The effectiveness of these standards is discussed under Issue #1.
“One size fits all” will not work; allow individual forests and ranger districts to deal with problems found in their districts.	Yes	126	This comment led to the refinement of the standards to allow for maximum flexibility for management at the Forest and District level, while still maintaining consistency across the region.
Do not close forest roads. Keep roads open for invasive plant early detection.	Yes	126	Alternative D was developed to address this comment.
Need inventory and mapping of invasive plant locations.	No	52	This comment is not about the effects of the Proposed Action.
Never apply non-native seeds; use native seeds whenever possible.	Yes	24, 221, 241, 243, 245	Alternative B was developed to require use of native seed and weed free hay in erosion control projects.
Require commercial users to post an invasive plant “bond” which could be used to hire eradication crews.	No	138	Funding mechanisms are beyond the scope of this EIS.
Do not lock yourselves into a limited selection of herbicides; use any/all that are approved by EPA and prescribed by a trained weed control expert.	Yes	139, 219, 235	Alternative D was developed to respond to this comment.
Consider all the new alternatives such as felted wool mulch, flaming, etc.	Yes	189	This comment was addressed by the alternatives.
Maintain the flexibility to use herbicides in roads and road ROW’s.	Yes	175	All alternatives retain flexibility to use some herbicides, although the choices are relative cost and effectiveness varies between the alternatives.
To restore invaded ecosystems, use hand removal, seed planting, and the introduction of natural predators.	Yes	260	Alternative B was developed to respond to this comment.
Provide a combination treatment of chemical application with seeding of non-persistent exotics.	Yes	255	All alternatives would approve the suggested strategy.
Keep tree canopy and reduce disturbances.	Yes	193, 196	Alternative B was developed to address this comment.

Comments About Social and Economic Effects

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Concern that use of herbicides will negatively affect tribal basket weavers and practitioners of traditional life ways.	Yes	10	These comments addressed in the Environmental Justice and Tribal/Treaty Rights Issue and associated analysis. Alternative B was developed to reduce risk of impacts to traditionally used plants.
Study secondary costs to agricultural producers as weeds move from federal ownership to private land.	No	240, 225	This comment is not about the effects of the Proposed Action. This comment is related to the purpose and need, which includes reducing spread of invasive plants from National Forest to other ownerships.
<p>Concern that more dollars need to be directed toward invasive plant control. FS should re-prioritize funding to spend more on invasive plant research. Noxious weeds need their own budgeting line item.</p> <p>How would the forest service acquire sufficient funding to carry out the task?</p> <p>Existing funding could be used more effectively with lobbying from congress to allow moving funds across line items like fire suppression money is transferred during fire emergencies.</p> <p>Funding for small governments so they can staff up to deal with this.</p> <p>Money better invested in hands-on-field work.</p> <p>Request designated funding through the revenue generated from Forest pass Program for those areas that qualify.</p>	No	42, 69, 45, 202, 91, 13, 15, 152, 204, 206, 262, 263	These suggestions are outside the scope of this EIS.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Mitigation and control of invasive plant populations should be forced on the prioritization of large scale and lowest cost treatments first.	No	11, 83, 125, 01, 24, 82, 98	Chapter 3 discusses a prioritization process; location, cost and economic impact of invasives are factors in prioritizing and determining treatments.
Prioritize areas for treatment by identifying the most “at risk” areas.			
To the extent that invasives interfere with the economic use of USFS lands they should be removed.			
Rivers and stream are conduits for the spread of invasive plants; upstream areas need treatment as targeted areas.			
Cost effectiveness should be paramount in determining treatment. The Proposed Action does not include the most cost-effective chemicals available.	Yes	71	Alternative D was developed to allow use of the most cost-effective chemicals available. Effects on treatment costs are discussed under Issue #5.
How much will control of invasive plants cost?	Yes	59,142	Relative costs of invasive plant treatment are discussed under Issue #5.
Cost to local economics of not treating weeds?	No	240	No alternatives exist that would not treat weeds; therefore this comment is outside the scope of this EIS.
Hand pulling large populations of weeds is not cost effective.	Yes	202	The relative effectiveness and costs of various treatment measures are discussed under Issues #1 and #5.
Public apathy is a major issue.	No	29	Public apathy is not an issue related to the effects of the Proposed Action.
Opposed to weed free hay.		116	Alternative D was developed to address this issue.
The spread of noxious weeds has negatively impacted the exercise of treaty rights by members of the Nez Perez Tribe.	Yes	15, 221	Effects on tribal and treaty rights are discussed in Chapter 4 under other issues.
Noxious weeds impact important Nez Perez cultural plants. Protection of these plants should be addressed in any alternative the FS requires.			

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
<p>The Proposed Action may unreasonably restrict use or access on National Forest. The rights of citizens to use National Forest should not be restricted.</p> <p>OHV have a right to use the land</p>	<p>Yes</p>	<p>83, 136, 93, 175, 210, 262</p>	<p>Alternative D was developed to reduce potential for road and OHV use area closures. Analysis for Issue #5 describes the effects of potential road closures from Prevention Standards.</p>

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Comments About Interagency Coordination and Partnerships

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
<p>Use help from volunteers, non-profit organizations, county soil and water conservationists, hikers, fishers, boy and girl scouts, migrant workers, farmers, ranchers, timber companies, inmates, recreational users, hunters, sportsmen, VMRC, other agencies, prison crews.</p> <p>Partner with groups that currently participate in trail maintenance for assistance with invasive plant control and removal.</p> <p>Develop new programs to pay unemployed to conduct physical control of invasive plants.</p> <p>Use work crews (inmates, volunteers, etc.) for manual treatment and herbicide treatment.</p>	<p>No</p>	<p>84, 81, 80, 71, 72, 73, 74, 79, 61, 63, 67, 69, 01, 24, 35, 15, 20, 144, 133, 137, 50, 114, 125, 126, 109, 43, 173, 175, 192, 157, 197, 203, 242, 228, 236, 206, 262, 263, 258, 03, 14, 30, 35, 39, 83, 115, 137</p>	<p>This comment is outside the scope of this EIS. The workforce suggested could be utilized under all alternatives.</p>
<p>Research what others are doing i.e. Oregon Dept. of Agriculture Noxious Weed Program, Oregon State University Vegetation Management Research Coop., R-5.</p>	<p>No</p>	<p>62</p>	<p>This is not an issue relating to the effect of the Proposed Action. Cumulative effects discussions for all issues include consideration of invasive plant management off Forest.</p>
<p>Cooperate with neighbors, other agencies, and NGO's to create a landscape scale weed database.</p>	<p>No</p>	<p>20</p>	<p>This is not an issue relating to the effect of the Proposed Action. Cumulative effects discussions for all issues include consideration of invasive plant management off Forest.</p>
<p>The problem is in the cities. Exert pressure on city/county administrative counterparts to have them force property owners to clean up their lots in the towns.</p>	<p>No</p>	<p>101</p>	<p>This comment is outside the scope of this EIS. This EIS relates to decisions about standards that would apply to invasive plant management on National Forests in Region Six.</p>

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Lack of weed-free feed regulations in the state of WA.	No	104	This comment is outside the scope of this EIS. This EIS relates to decisions about standards that would apply to invasive plant management on National Forests in Region Six.
Funding needs to be made available for projects on private lands.	No	99	Funding for projects outside of National Forests in Region Six is beyond the scope of this EIS.
Penalize private landowners who do not combat weeds on their own land.	No	132, 33	This comment is outside the scope of this EIS. This EIS relates to decisions about standards that would apply to invasive plant management on National Forests in Region Six.
Examine creation of incentive programs such as Audubon Society golf course/ wildlife sanctuary programs. Partner with nursery associates, nursery growers, landscape contracts and landscape architects. Use incentives to attract volunteers for weed pulling and restoration such as free forest passes, T-shirts, etc. Develop a grant program. Use grants to acquire funding.	No	197, 208, 235, 228	This comment is outside the scope of this EIS. This EIS relates to decisions about standards that would apply to invasive plant management on National Forests in Region Six.
Ask forest users to report weed infestations.	No	50	This comment is outside the scope of this EIS. This EIS relates to decisions about standards that would apply to invasive plant management on National Forests in Region Six.
	No	57	Public reporting scenarios are beyond the scope of this EIS and could occur regardless of selected alternative.

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
<p>The Forest Service to work cooperatively with private landowners to reduce invasive species on private land. Establish better communication with states/local communities concerning their noxious weed concerns. Establish standard GIS and reporting across all federal and state jurisdictions to facilitate information sharing. Concern with poor consistency across jurisdictions in methods and approved chemicals for treatment.</p> <p>Obtain grants for schools, non-profit organizations, and other interested parties to do invasive removal. Partner with educational institutions, elementary, high school, colleges, they can be trained to work on projects and perhaps gain credit for them.</p> <p>Expand Americorps and have them pull weeds.</p> <p>Working with groups like the Okanogan Highland Alliance, the Sierra Club, and the Cattle Range Conservation group would produce workers and volunteers to achieve the most cost effective outcome.</p> <p>Partner with State, County, and local boards to treat all roads on and off the forest.</p>	<p>No</p>	<p>42, 71, 65, 13, 15, 16, 47, 21, 54, 121, 212, 259, 78, 142, 144, 4, 238, 33, 15, 20, 124, 204, 155, 150, 98, 99, 112, 124, 127, 52, 241, 220, 221, 257, 237, 255, 260</p>	<p>This comment is outside the scope of this EIS. This EIS relates to decisions about standards that would apply to invasive plant management on National Forests in Region Six.</p> <p>The EIS does discuss how invasive plant management on National Forest may affect off-Forest spread of invasive plants and off-Forest management techniques.</p>

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Comments Related to the Terrestrial Environment

Comment	Substantive Issue?	Letter Number	How Comment is Addressed in Analysis
Objections to aerial herbicide application based on concerns about risks to the health of terrestrial environment from the Proposed Action.	Yes	57, 80	This comment is addressed in analysis for Issue #3, which discusses the relative risk of herbicide exposure to wildlife. Alternative B was developed to reduce the number of acres of herbicide projected for annual use and restricts the formulations to those with only negligible effects to wildlife.
General concerns over the spread of invasive plants and the impacts on native species and the loss of functioning wildlife habitats.	No	56, 6, 91, 240	This is not a comment related to the effect of the Proposed Action. Chapter 3, Affected Environment, discusses the effects of invasive plants on wildlife.
Concern over environmental damage from invasive plants.	No	25, 142, 21, 212	This is not a comment related to the effect of the Proposed Action. Chapter 3, Affected Environment, discusses the effects of invasive plants on various ecosystem components.
Choose actions that have the least negative impacts on the soil, water, wildlife, air quality, and native plants.	No	168, 164, 212, 249	This comment is too vague to analyze. However, the potential for adverse effects on the environment is one of the Regional Foresters decision factors regarding the final selection of alternative. .
Concern over the spread of invasive plants by wildlife and feral horses and burros.	No	99, 55	This comment is not about the effects of the Proposed Action. The Forest Service cannot control the spread of invasive plants on the feet of wild animals.
Concern over large scale prescribed fire and potential damage to topsoil/humus layer.	Yes	76	Effects on soils from prescribed fire and other methods of invasive plant control were analyzed under the Soil Productivity issue.

<p>The proposed requirement to restore lands using native plants is unnecessary. Any effort to so should be entirely voluntary.</p> <p>Restore native plant communities; identify where and when native re-vegetation is appropriate</p>	<p>Yes</p>	<p>9, 221</p>	<p>This comment was addressed by eliminating requirements for native plant regeneration in Alternative D. The effects of this are described under Issues #1, #2 and #5.</p>
<p>Think on a bio-corridor level.</p>	<p>No</p>	<p>256</p>	<p>This comment is not about the effects of the Proposed Action and is too vague to analyze.</p>
<p>Herbicides kill bacterial fungi in the soil, which breaks down soil for food.</p>	<p>Yes</p>	<p>184</p>	<p>This comment was addressed in the Soil Productivity Issue.</p>
<p>Allow for natural fire regime in fire dependant communities.</p>	<p>No</p>	<p>258</p>	<p>This comment is not about the effects of the Proposed Action.</p>
<p>Use of native seed only on NF land is too expensive and limits the ability to provide soil protection from erosion and noxious weed invasion.</p>	<p>Yes</p>	<p>255, 260</p>	<p>This comment was addressed by eliminating requirements for native seeds for regeneration in Alternative D. The effects of this are described under Issues #1, #2 and #5.</p>
<p>Non-native beneficial grasses and forage should be considered for vegetation.</p>	<p>Yes</p>	<p>255</p>	<p>This comment was addressed by eliminating requirements for native plant regeneration in Alternative D. The effects of this are described under Issues #1, #2 and #5.</p>
<p>Locate all non-native invasives that have the greatest potential threat to native species and wildlife.</p>	<p>No</p>	<p>252</p>	<p>This comment is not about the effects of the Proposed Action and is too vague to analyze.</p>
<p>Concerned about the use of biological controls on "Biotic Integrity."</p>	<p>Yes</p>	<p>44</p>	<p>This issue was addressed in the analysis.</p>
<p>Must consider the effects of seeding areas with other exotics.</p>	<p>Yes</p>	<p>13</p>	<p>Alternative B was developed to address this comment. It requires use of native seed in projects. The effects of this requirement are discussed under several issues.</p>

Comments About the Aquatic Environment

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Concerns about the use of herbicides and the risk they pose to aquatic species health.	Yes	57, 17, 170, 171, 261	This comment is addressed through Treatment/Restoration Standards in all alternatives to reduce the potential for herbicide to enter streams. This issue is analyzed under Issues #4, Human Health, and the Aquatic Organism Issue.
Concerns for the use of herbicides polluting streams and water systems.	Yes	72, 17, 113, 171, 174, 195, 247, 229	This comment is addressed through Treatment/Restoration Standards in all alternatives to reduce the potential for herbicide to enter streams. This issue is analyzed under Issues #4, Human Health, and the Aquatic Organism Issue.
Livestock grazing of riparian areas results in removal of native vegetation, trampling of meadows, sloughing and raw stream banks, and introduction of exotic weeds.	No	153	This comment is not about the effects of the Proposed Action.
General concern for water quality for salmon and steelhead.	No	148, 170, 171	Too vague to analyze. Analysis includes required disclosures about effects on special status fish species.
Vitaly important to consider all ingredients in herbicides, including those not listed on the label.	Yes	170	The analysis throughout the EIS considers all potentially toxic ingredients in herbicide formulations.
Concern for providing best protection for riparian and stream values while proceeding on an invasive plant abatement program.	Yes	80	This comment is addressed in Treatment Standards in all alternatives that reduce the likelihood for adverse effects on riparian and stream values.
Potential for impacts to water quality is a major issue.	No	254	This comment is too vague to analyze. Effects of herbicide on drinking water and fish are discussed.

Comments About Wilderness and Recreation Effects

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Imperative to manually remove invasive plants from wilderness areas	No	50	The Proposed Action does not propose to use motorized equipment or herbicide in wilderness areas.
Invasive plants spread from private land to public land, especially into wilderness areas.	No	122	This comment is not about the effects of the Proposed Action. The fact that invasive plants spread across all land ownerships is considered in the EIS.
Concern about weeds moving along roads into National Parks and along trails into wilderness areas	No	232	This comment is not about the effects of the Proposed Action. The mechanisms of invasive plant spread and their adverse effects are discussed in Chapter 3, Affected Environment.
Potential for impacts to wilderness and roadless areas are a major concern.	No	254	This comment is too vague to analyze.
General concern for impacts to recreation uses if weeds are left unattended.	No	261	This comment is outside the scope of the EIS. No alternatives would leave weeds unattended.

Comments about Effects on Threatened and Endangered Species

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Concerned about the impact of invasive species on the threatened and endangered species.	No	6, 16, 211, 190, 201	This comment is not about the effects of the Proposed Action. The mechanisms of invasive plant spread and their adverse effects are discussed in Chapter 3, Affected Environment.
Protection of threatened land base of native plants from invasive species.	No	16	This comment is not about the effects of the Proposed Action. It is reflected in the purpose and need for action.
Effects of herbicides for control of invasive species on endangered and threatened species. Potential impacts to TES species are a major issue	Yes	164, 167, 168, 172, 254	This comment is addressed in the Threatened and Endangered Species issue. All alternatives include standards to reduce risk of herbicide effects to non-target and special status species.
Effects of herbicides on food and habitat for endangered species.	Yes	167	This comment is addressed in the Threatened and Endangered Species issue. All alternatives include standards to reduce risk of herbicide effects to non-target and special status species.
Domestic sheep and goats should not be used for weed control in Bighorn sheep habitat; disease concerns for bighorn.	No	67	This comment is outside the scope of this EIS, and appropriately addressed on the site-specific project level thru grazing allotment planning.

Comments about Public Education

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Provide free brochures with weed identification.	No	57, 87, 82, 60, 04, 115, 94, 147, 54, 47, 130, 218, 233, 238	This comment is outside the scope of the EIS. Educational activities such as providing brochures may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Inform public when weed is producing seed and recommend no travel into national forest for that time.	No	57, 70, 52	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Hands on help and education to farmers and landowners.	No	87, 218, 224	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
<p>General education to public and workers.</p> <p>Create a video about invasive species.</p> <p>Provide educational insert in maps and permits.</p> <p>Create ad campaign with “Smokey Bear” impact.</p> <p>Keep public informed of research.</p> <p>Send out informational letters to property owners.</p> <p>Recruit volunteers to provide information at by-ways.</p> <p>Public outreach and education that focuses on preventative strategies.</p>	<p>No</p>	<p>87, 80, 74, 71, 65, 67, 04, 08, 33, 116, 34, 119, 26, 30, 15, 16, 19, 132, 120, 137, 45, 162, 157, 121, 127, 52, 54, 192, 197, 203, 204, 208, 242, 248, 212, 223, 231, 236, 237, 257, 262, 33, 206, 27, 114, 53, 173, 237</p>	<p>This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.</p>
<p>Train public and volunteers in handling/ use of herbicides/toxics chemicals.</p> <p>Train all field officers in invasive plant recognition, preventing, and reporting.</p> <p>Train public and workers on early detection.</p>	<p>No</p>	<p>81, 107, 183, 192, 148, 202, 242</p>	<p>This comment is outside the scope of the EIS. Educational activities such as providing training may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Training would help meet the goals of the EIS.</p>
<p>National campaign to educate recreationists.</p> <p>Provide information at OHV vendors.</p>	<p>No</p>	<p>78, 103, 189, 236, 52, 54</p>	<p>This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.</p>

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Start education in schools.	No	73, 137, 219	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Develop public reporting system. Create mail-in/drop-off form for reporting. Establish a hot line so people can report weeds. Contact “geocache’s,” a group that hunts for treasure with GIS equipment in hand. They could take exact location of invasive plants they see.	No	72, 66, 67, 47, 252, 258	This comment is outside the scope of the EIS. Informational activities such as coordinating public reporting may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. A public reporting system would help meet the goals of the EIS.
Education on seed types and where found.	No	70	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Provide information at campgrounds and trail head bulletin boards, also at hunting license vendors and vehicle registration offices.	No	175, 189, 219, 233, 252, 258	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Need a “medical dictionary” type book on noxious weeds that lists plants, discusses habitats, and prescribes useful treatments and % of chance or degrees of effective reduction.	No	199	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Use volunteers, individuals, businesses, etc. to help educate the public.	No	206	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Increase awareness of noxious weeds identification by permittees, timber operators, personnel and the public.	No	243	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Educate policy makers of the facts regarding invasive plant control.	No	245	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Visibly promote the economics and efficacy of using herbicides in a responsible manner.	Yes	213	This comment is addressed in Issue #1, Effectiveness of the Alternatives, to the extent that demonstrated treatment effectiveness may affect how others use herbicides.
Provide the true cost of improving control and restoring native vegetation to congress, NF management and the public.	No	219	This comment is outside the scope of the EIS. Educational activities such as providing information may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.
Areas most susceptible to invasive plants need more restrictions with signs stating the reasons.	No	228	This comment is outside the scope of the EIS. Educational activities such as signage may be categorically excluded from documentation in an EIS and may occur as a complement to all alternatives. Educational projects would help meet the goals of the EIS.

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
<p>Start a control program in the places where people live. This includes all residences whether on private, state or federal land. This is where the most non-natives grow.</p> <p>The plan should not be limited just to “National Forest” lands; the problem crosses multiple ownership boundaries.</p>	No	252, 257	This comment is outside the scope of the EIS, which deals specifically with NF lands.
<p>Outreach should be non-paternalistic</p>	No	256	This comment is outside the scope of the EIS. Decisions about style of public outreach are not subject to NEPA.
<p>Communicate face to face as much as possible.</p>	No	256	This comment is outside the scope of the EIS. Decisions about style of public communication are not subject to NEPA.
<p>Convey the message that “no single method fits all needs.”</p>	No	257	This comment is outside the scope of the EIS. Decisions about style of public outreach are not subject to NEPA.
<p>Provide incentive programs for public; i.e. awards, caps, free passes, etc.</p>	No	258	This comment is outside the scope of the EIS, which deals specifically with NF lands.
<p>Encourage volunteers to adopt a portion of the forest to keep clear of weeds.</p>	No	203	Workforce decisions are beyond the scope of this EIS. Use of volunteers would be consistent with the goals of all alternatives.

Other Comments

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
<p>Invasive plants should be studied, and ways found to convert them into useful products or resources.</p>	No	40, 137	<p>This comment is not about the effects of the Proposed Action. Invasive plant study is not subject to NEPA. Harvesting of natives for medicinal purposes may be compatible with treatments in all alternatives.</p>
<p>Encourage whole plant harvesting of invasive for medicinal purposes.</p>	No	10, 55, 58, 60, 92, 24, 58, 105, 112, 118, 189	<p>General use of prescribed fire as a forest management tool is discussed in Chapter 3, but is outside the scope of this EIS.</p>
<p>Use fire as a tool to keep healthy native plant communities.</p>	Yes	22, 204	<p>The effects analysis relies on quantitative models and measurable comparison factors where possible.</p>
<p>Mimic natural disturbances with FS activities.</p>	Yes	194	<p>This alternative was considered and provided the basis for development of Alternative B. Some aspects of the suggested alternative were dismissed from consideration because they are beyond the scope of this EIS.</p>
<p>FS should measure and predict impacts from proposed activities using a quantitative model with predictive capacities.</p>	Yes	24	<p>All alternatives would improve project level consideration of invasive plants.</p>
<p>Consider a separate “restore native ecosystems” alternative.</p>	No	24, 82	<p>This comment is beyond the scope of this EIS. An increase in native species output would be consistent with the goals of this EIS.</p>
<p>Improve the analysis/consideration of invasive in other FS NEPA.</p>	Yes	27	<p>Alternative B was developed to increase the requirements for follow up inspections along roads.</p>
<p>Encourage local nurseries to increase their output of native species.</p>	Yes	247	<p>Alternative B was developed to address this comment.</p>
<p>Schedule regular surveys along FS roads; particularly the year after timber harvest. Once invasives are established, use “holistic” restoration/rehabilitation. Invest and build new fences, gates, range improvements to improve livestock distribution on NF grazing allotments.</p>	No	60	<p>This comment is not related to the effects of the Proposed Action.</p>

Comment	Substantive Comment?	Letter Number	How Comment is Addressed in Analysis
Explore the use of natural, organic pesticides.	No	78, 180, 185, 201, 208	These comments were considered during alternative development, but judged to be too vague. It is outside the scope of this EIS to “explore” unproven or untested new chemical agents.