



WILDERNESS WATCH

Keeping Wilderness Wild

May 20, 2019

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Patricia O'Connor
Forest Supervisor
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RE: Bridger-Teton Invasive Plant Species DEIS

Sent Via Email to: comments-intermtn-bridger-teton@fs.fed.us

Dear Supervisor O'Connor:

The following comments on the Invasive Plant Management Draft Environmental Impact Statement for the Bridger- Teton National Forest are submitted on behalf Wilderness Watch. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. Our comments focus on the Wildernesses and the Wilderness Study Areas affected by this proposal. We have several serious concerns with the proposed action and questions about past implementation of the 2004 Environmental Assessment (EA) and how it fits into the proposal.

Wilderness and Wilderness Study Areas

We appreciate the danger to native ecosystems that noxious weeds pose. However, the first question that the agency must address is whether this extensive weed control proposal 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 and the WSAs established under the 1984 Wyoming Wilderness Act.

The DEIS evades this issue without doing the requisite analysis. It merely proclaims, without providing supporting evidence:

Invasive weed treatments are necessary within Wilderness, WSA's, and IRA's to provide for the protection and perpetuation of natural biophysical conditions, while also maintaining a high degree of solitude

for visitors. Some lower-priority weeds (e.g., houndstongue) can be effectively controlled by pulling or grubbing, after which the weeds are bagged and hauled out of the wilderness. However, virtually all of the high-priority species cannot be controlled in that manner and may even spread with such attempts. For these, herbicide application is the only long-term solution to eliminate them and maintain native plant communities and the wilderness character.

DEIS at 106. However, the DEIS does not detail the expected amount of herbicide spraying in Wilderness and WSAs, the past amount of herbicide spraying, the success or failure of the program over the past 15 years the 2004 EA has been in effect, whether introduction of exotic insects would be allowed into Wilderness and WSAs, whether exotic insects have already been introduced, or why the new program won't be in perpetuity, like the program tiered from the 2004 EA appears to be.

The claim that "herbicide application is the only long-term solution to eliminate" weeds is belied by the fact that since 2004, weeds have not been eliminated from Wilderness in spite of fifteen years of spraying. A copy of the 2004 EA should have been provided online so people can see the projected impacts and success of that program compared to what it claimed would happen.

Further, the DEIS states that more spraying, including aerial spraying, may occur in Wilderness and WSAs with the completion of an MRDG. Yet nowhere are the impacts of aerial spraying analyzed in the DEIS on Wilderness or WSAs. We are not told about how many acres would be aeriually sprayed within Wilderness or WSAs. In fact, no details are provided for Wilderness and WSAs. At best, the DEIS is a programmatic document and inadequate to approve a new program of aerial spraying inside Wilderness, WSAs or even elsewhere on the national forest.

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 do the an exceptions occur in the Wilderness Act that would support this massive program you have proposed?

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 even more herbicide use (and aerial spraying), possible introductions of exotic species, and an aggressive and manipulative program of going after weeds in the wilderness is appropriate. The question is the cure worse than the disease needs to be asked.

The use of herbicides can have serious and unintended consequences. Agencies have not done due diligence when proposing new herbicides in wildlands and elsewhere. One of the new herbicides the Forest Service seeks to use is mentioned in the following article: https://missoulia.com/news/local/um-researchers-find-lack-of-government-accountability-on-widespread-herbicide/article_a13ac9e9-f535-51ef-a8ce-b398b6c29e62.html Also, introducing biological control insects is dangerous and contrary to the Wilderness Act and could possibly even be worse as the use of herbicides in terms of unintended consequences. Herbicide use can

be stopped, though toxins do persist over time, 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 could be a problem where weeds are in the same family as sensitive plant species. 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.

This distinct possibility of altering an evolving plant community balance, though the 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 should have compared the harm to the wilderness character from the proposed intervention, particularly aerial applications, 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.

Another problem with the inadequacy of the DEIS is that it is likely there will be no site-specific NEPA analysis for the program in Wilderness or WSAs. Rather, it seems the Forest Service intends to substitute an MRDG for NEPA compliance on a site-specific level. The MRDG process is seriously flawed on its own let alone as an inappropriate replacement for site-specific NEPA analysis.¹ In any case, the public and presumably the Forest Service have not had the opportunity to review the MRDG documents that may be prepared in the future as part of this DEIS.

¹ The MRDG process is based upon the wilderness character monitoring protocol that erroneously fragments wilderness character into qualities such as natural and untrammeled, and then seeing them in conflict with each other. Further, the MRDG two-step process ensures that untrammeled wilderness, the fundamental tenet of wilderness stewardship, will lose in step one before the weighing of tools occurs in step two. Wilderness or untrammeled, was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight "fundamental principles" for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, "Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness... Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness."

Prevention and Efficacy

What is shown to be true is that prevention is the best way to control weeds. The DEIS pays little attention to this important aspect. If the agency were truly concerned about weeds in the Bridger-Teton National Forest Wildernesses and WSAs 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 may not be considered a weed in terms of weed free hay in every jurisdiction because it is a relatively recent invader. 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—packrafts are used in the Teton Wildernes--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 and commercial interests drive wilderness administration rather than the mandates of the Wilderness Act.

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. In any case, spraying trail corridors does not 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? What is the status quo in the Wildernesses and WSAs in terms of amount of herbicide spraying and other actions? Will the amount of herbicide use increase as a result of the weed program in the Wildernesses and WSAs than in the past? If so, why should we expect that ever increasing amounts of herbicides will control let alone eradicate weeds? What about the use of exotic species? Have weed infestations in these Wildernesses increased, decreased or stayed the same?

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.

Other considerations

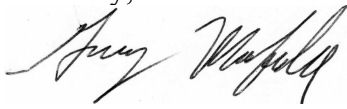
One old and one new weed present serious threats because they can affect fire ecology: cheatgrass and ventenata grass. Efforts to control spotted knapweed may well give these two species a competitive advantage over knapweed. They may pose even greater ecological risks than does knapweed.

How does the threat of weeds compare with other threats? The agency allows (or allowed) the deliberate introduction of exotic species through fish stocking in the Wilderness lakes. Are the impacts of exotic weeds as great as the harm to aquatic habitats from fish stocking, agency fire suppression, or domestic livestock grazing in Wilderness and the WSAs?

Monitoring results of weed control programs from other Wildernesses in the region and the Wildernesses on the Bridger-Teton National Forest need 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.

Please keep us updated on this project. Send a copy of any documents and notification to Wilderness Watch at PO Box 9175, Missoula, MT 59807.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane". The signature is fluid and cursive, with the first name "Gary" written in a larger, more prominent script than the last name "Macfarlane".

Gary Macfarlane
President

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