



November 16, 2014

Forest Invasive Plant Treatment DEIS
Phyllis Reed, Project Coordinator
Mt. Baker-Snoqualmie National Forest
2930 Wetmore Ave. Suite 3A
Everett, WA 98201

Dear Ms. Reed,

As organizations committed to stewardship of the natural resources of the Mt. Baker Snoqualmie National Forest (MBS), we are writing to express our support for **Forest Invasive Plant Treatment DEIS** Alternative 2, the preferred alternative. Measures proposed by Alternative 2 would greatly improve the capacity of the MBS to control invasive plants. Although invasive plants pose a grave threat to habitat throughout the Forest, the existing control program is handicapped by inadequate funding and outdated tools. Therefore, we support implementation of Alternative 2, including the following measures:

Allow use of all Region-6 approved herbicides, and aminopyralid

In a perfect world, mechanical and manual control would be sufficient to limit the spread of invasive plants. However, such methods are often inadequate even for small infestations, let alone for large infestations widely dispersed across a National Forest. Especially on this landscape scale, herbicides are the only effective tool to control yellow archangel, yellow hawkweed, Bohemian knotweed, spotted knapweed, and many other species -- aggressive invaders that if left alone, would eventually choke out habitat throughout the MBS.

With the broader list of approved herbicides, the MBS control program will have access to the most effective, least-risk herbicide for each targeted species. Currently, for many species that “ideal” herbicide isn’t an option. As a result, greater volumes of less effective herbicides are applied.

Allow broadcast herbicide application

For some species, spot spraying of dense infestations is ineffective. For example, spot spraying dense yellow hawkweed infestations will leave uncontrolled the seedlings and stolons growing between treated plants. As a result, treatments often must be repeated. For such infestations broadcast application is superior both for control and for lessening the overall use of herbicide.

Outside of Wilderness areas, allow mechanical control

For some invasive plants, mowing and string trimming machines can be important non-chemical components of an integrated treatment program. For example, these methods can be effective for dense roadside stands of Himalayan blackberry, reed canary grass, and Scotch broom.

Inside of Wilderness areas, allow all control methods except mechanical, broadcast

Because remote infestations can be exceedingly difficult to access, we're fortunate that our Wilderness areas are relatively free of invasive plants. With access so difficult and time-consuming, control must be effective the first time; this means using herbicides when needed. English holly and other invasive plants are showing up in remote trailless areas and it will be a struggle to control them in the first place, let alone to return for follow-up control; therefore herbicides must be part of the control toolkit.

Establish an Early Detection and Rapid Response (EDRR) process

Timely control of new infestations is essential for effective weed control. Replacing the current cumbersome review process with a streamlined Early Detection and Rapid Response process is a critical step for the MBS control program. Currently, it can take one or more years from the time an infestation is reported to the time it is approved for control. Many invasive weeds spread rapidly, and this bureaucratic process can turn simple, inexpensive control projects into costly multi-year efforts.

For example, about 15 years ago a butterfly bush infestation took root on the Middle Fork Road and spread to multiple sites along the Middle Fork Snoqualmie River (a single butterfly bush can produce hundreds of thousands of lightweight seeds that are easily dispersed by wind and water). These infestations could only be accessed by kayak or raft, or by fording the river in late summer. It took annual visits spread over 10 years to eliminate all infestations. Early control would have saved a great deal of work.

When trained personnel locate an infestation that requires herbicide, and are equipped with the appropriate equipment and herbicide, they should have the authority to make a decision to control the infestation while still on site. Immediate control will prevent further spread of the plant and greatly increase the speed and effectiveness of control work overall.

Washington State and county land managers already have EDRR programs with such policies in place. Until such a program is active on the MBS, its overall control program will be hobbled.

Alternative 2 - Concerns and suggestions

Maximum 5,000 acres treated per year and 13,500 for life of project

The DEIS analysis is based on the existing data, as it should be. Measures proposed in Alternative 2 are an excellent response to what is known about weeds on the MBS. However, we believe those data paint an incomplete picture of the current state of weed infestations across the MBS, simply because most of the MBS has not been surveyed due to years of inadequate funding. We believe that the 10-fold increase from 2005 to 2014 in number of reported infestations is largely due to the vigorous citizen science survey programs created in that period, as well as expanded surveys by non-profit partners (work supported by the MBS, WA DNR, King County, and other agencies). In other words, the infestations already existed, but no one had been looking!

While these surveys have been invaluable, they only covered a small percentage of trails, trailheads and other disturbed sites on the MBS, and even less of our river corridors and vast trailless areas (or forests between trails). For example, two off-trail surveys this summer in the

Middle Fork Snoqualmie Valley found more English holly sites than listed in DEIS table 5 for the entire MBS.

We understand that the DEIS proposals must be based on existing data. However, given the limits of these data, and the strong likelihood that known infestations are the tip of the iceberg, we suggest that you allow adjustments to these acreage limits if new surveys uncover significantly more infestations.

Duration of project

Again, we understand that a DEIS analysis must be based on reasonable parameters, including number of years until completion. However, weed control will always be an ongoing process, especially for a National Forest adjacent to a huge metropolitan area and crossed by major highways. Whether invasive weeds are spread by vehicles, wind, or birds, they will continue to pose a major challenge. If the time limit can't be removed, there should be a mechanism to extend the period as needed.

Budget projections

The proposed budget indicates a commitment to a much-expanded control program. However, the estimated treatment costs don't seem to factor in the cost of controlling remote infestations. While "\$200 per acre to accommodate the full range of treatment options at any given site" may be sufficient for roadside infestations, many newly reported infestations are in remote areas of the forest. To survey, control, and monitor sites that are far from roads and even from trails - the far end of decommissioned roads, campsites deep in the Alpine Lakes Wilderness, riverbanks reached by kayak or fording - will require significant staff time. Budgets must factor in full-day or multi-day trips to visit such sites.

Related to this issue is the statement on DEIS page 61, under 3.1.1 "Treatment Analysis Areas": *"This inventory is based on a variety of sources and not all sites have been validated by an invasive plant specialist. Validation by an **invasive plant specialist** would occur before treatment of any site."* This seems to imply that only MBS invasive plant specialists may validate sites. Due to the limited number of MBS staff who can do this work, such a requirement would create a significant bottleneck for the EDRR program. We urge you to allow partners working under agreements with the MBS to validate sites as well.

We urge you to expand support for the citizen "Weed Watcher" programs that have been active in the Upper Snoqualmie Valley for the last ten years. They've proven to be very effective, and provide a low-cost, enthusiastic survey team for the MBS, WA DNR, and King County weed control programs.

To limit future infestations, we believe budgets for all ground-disturbing projects should support post-project surveys. MBS weed control protocols for construction equipment and materials are good, but it's inevitable that some weeds will be introduced. Without follow up surveys, weeds introduced by these projects can go undetected and uncontrolled for years.

No Action Alternative – comments

A No Action decision, or a decision that eliminates key measures proposed in Alternative 2, would cause serious harm to the environment. Restricting control to the current set of approved herbicides would mean continued use of a higher volume of less-effective herbicides. Forbidding broadcast spray will have a similar effect, making it necessary to repeat spot spray application over multiple seasons. If an EDRR program isn't approved (or only a

limited program is approved), easily controlled infestations will continue to grow into large, difficult-to-control infestations.

When infestations aren't controlled on MBS lands, they quickly spread to neighboring city, county, and state public lands where all of these methods are generally allowed. So in the end, they will be used anyway, but likely in greater quantities than would have been necessary had the infestations been controlled at their source.

Thank you for the opportunity to express our support for the Forest Invasive Plant Treatment DEIS Alternative 2.

Sincerely,

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