



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL  
REVIEW AND  
ASSESSMENT

November 14, 2016

Carol Brown  
Ketchum Ranger Station  
206 Sun Valley Road  
Sun Valley, Idaho 83353

Dear Ms. Brown:

The U.S. Environmental Protection Agency has reviewed the Boise National Forest and Sawtooth National Forest Draft Environmental Impact Statement for the proposed Sawtooth and Boise National Forests Invasive Plant Treatment (EPA Region 10 project number: 15-0044-AFS). Our review of the EIS was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

This DEIS analyzes the environmental effects of treating invasive plants through a combination of biological, manual and mechanical, chemical (herbicide), and restoration methods on the Boise and Sawtooth National Forests. The analyzed alternatives include the No Action, Current Management, and alternatives that describe various methods of herbicide application. Alternative 3, the Proposed Action, employs an adaptive management approach that allows application of herbicides with restrictions in riparian areas.

As a result of our review, we have assigned a Lack of Objection (LO) rating to the DEIS. A copy of our rating system is attached. We agree that a clear and comprehensive integrated invasive plant management strategy promotes timely and effective invasive plant management on the Forests. We support many of the project design elements of the Proposed Action including:

- Effectiveness Monitoring (Appendix E) with details outlining procedures for implementing treatments, project management responsibilities regarding application and monitoring, and site-specific level monitoring to inform adaptive management.
- Compliance with EPA's National Pollutant Discharge Elimination System General Permit for Pesticides.
- Incorporating Early Detection and Rapid Response (EDRR).
- Prescriptive buffers near open water/shallow groundwater for herbicide application.
- Mitigation to avoid impacts to aquatic and terrestrial species (e.g., wind thresholds for applying herbicides).

While we support the overall approach to address the important issue regarding invasive plants, we recommend that the final EIS include additional information regarding the terms and conditions that

would apply to Endangered Species Act listed species. The DEIS outlines Best Management Practices from the previous Biological Evaluation/Biological Opinion for the northern portion of the Sawtooth NF (USFWS<sup>1</sup> and NMFS<sup>2</sup>) that would continue as part of the Current Management/No Action Alternatives. These terms are critical components in ensuring that chemical treatments are applied in a protective manner. However, these BMPs are not incorporated into the Proposed Action. The DEIS states that consultation under ESA Section 7 will be completed prior to the use of new herbicides or biological agents and that "Forests will check any existing Biological Opinion terms that may be in place." We support the review of terms and conditions from existing BOs on the Forests. We also concur with the need to incorporate any additional measures identified through consultation on chemical applications that were not previously analyzed. To ensure that project design criteria are protective of ESA species, we recommend that the final EIS and Record of Decision commit to and summarize existing terms that would be relevant to proposed treatments, as well as any additional requirements that may arise through consultation on the Forests' proposed invasive plant program.

We appreciate the opportunity to offer comments on the draft EIS. Please contact me at (206) 553-1601 or by email at [littleton.christine@epa.gov](mailto:littleton.christine@epa.gov), or you may contact Lynne Hood of my staff at (208) 378-5757 or at [hood.lynne@epa.gov](mailto:hood.lynne@epa.gov) with any questions you have regarding our comments.

Sincerely,



Christine B. Littleton, Manager  
Environmental Review and Sediments Management Unit

---

<sup>1</sup> U.S. Fish and Wildlife Service. 2012. Noxious Weed and Invasive Plant Management Program on the Sawtooth National Forest-Fairfield and Ketchum Ranger Districts, and Sawtooth National Recreation Area, Idaho-Biological Opinion. OI EIFW00-2012-F-0104.

<sup>2</sup> National Marine Fisheries Service (NMFS). 2012. Endangered Species Act Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation Programmatic Noxious and Invasive Weed Management Program; Upper Salmon River Subbasin HUC 17060201; Custer and Blaine Counties, Idaho. 2012/01793.

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.