

Navajo Nation Integrated Weed Management Plan Final Programmatic Environmental Impact Statement

Response to Comment Report

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Prepared for:

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Comment Response Table

The Bureau of Indian Affairs (BIA) decision-making process is conducted in accordance with the requirements of the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations, and U.S. Department of the Interior and BIA policies and procedures implementing NEPA. NEPA and the associated regulatory and policy framework require that all federal agencies involve interested groups of the public in their decision-making, consider reasonable alternatives to proposed actions, and prepare environmental documents that disclose the potential impacts of proposed actions and alternatives. Public involvement, consultation, and coordination have been at the core of the planning process leading to the Navajo Nation Integrated Weed Management Plan Programmatic Environmental Impact Statement (PEIS). These efforts were accomplished through public meetings, alternative means of comment submittal, news releases, a planning website, and Federal Register notices.

Comments on the Draft PEIS were analyzed in detail and systematically categorized by the subject of individual comments contained in each submittal. The categories for comment analysis included weed treatment projects, weed treatment methods, community land use plans, project funding and cost share, project planning, project compliance, community outreach, resource issues, Section 106 Consultation, legal authority, and project information and maps (listed alphabetically). Comments were further classified by the type of comment submittal (e.g., written letter, email, public hearing comments, or through the BIA project website comment form) and the source of the comment (e.g., individual, organization, tribal agency, federal agency, state agency, municipal government). The basic structure for how comments were coded and analyzed is presented below.

Individual comments received on the Draft PEIS were tagged as either “substantive” or “not substantive.” Generally speaking, “substantive” comments are those that call into question the accuracy of specific information provided in the Draft PEIS; provide alternative sources of technical or resource information; suggest project alternatives beyond those presented in the Draft PEIS; or question, on a reasonable basis, the analytical assumptions, methodologies, or conclusions presented in the Draft PEIS. “Not substantive” comments are those that merely express an opinion; raise issues that are beyond the scope of or irrelevant to the current project; take the form of vague, open-ended questions, or address minor edits. The BIA notes and records “not substantive” comments, but they do not receive a formal response. Some may note edits that were made to clarify the question being raised but did not result in considerable changes to the document.

Comments identified as “substantive,” on the other hand, formed the basis for much of the revision that occurred between publication of the Draft PEIS and the Final PEIS. The 45-day public comment period for the Navajo Nation Integrated Weed Management Plan Draft PEIS opened on October 29, 2021 (coinciding with the date of publication of the Draft PEIS) and ended on December 15, 2021. The BIA held five virtual public hearings from November 15 until November 20 to take public comments. A total of 55 members of the public attended the meetings. In all, 63 individual comments were submitted and received by the BIA. Of these, as recorded below, 52 comments were determined as “not substantive” and therefore not requiring formal BIA response or changes to the PEIS. After analysis, the “substantive” comment submittals were determined to contain a total of 11 individual substantive comments that would require BIA response. The material that follows in this appendix provides the reader with an overview of the comments received; how these were analyzed; and whether specific changes to the PEIS resulted from BIA consideration of these public comments.

Navajo Nation Integrated Weed Management Plan Public Review Period Comment Matrix

Comment Theme: Availability of the Public Hearing Presentation

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
1	11/15/2021	Question asked at Public Hearing meeting	Saraphine Woody	I'm a Huerfano Chapter Land Board official. Will a copy of today's presentation be emailed to us?	Not substantive. A copy of the presentation is available on the project website. The BIA posted videos of the English and Navajo version to the website after the Public Hearings ended on November 20. All meeting attendees also received an email with a link to the meeting materials, including a recording of the presentation.	No edits made

Comment Theme: Weed treatment projects

No.	Date	Type of Comment	Commenter Name	Comment	Final BIA Response	Edits Made
2	11/16/2021	Question asked at Public Hearing meeting	Roland Smallcanyon	There are tumbleweeds along the power and waterlines that show up after the lines are installed and there's nowhere else out there for them to come from. As a grazing official, I applied for funding to eradicate them with Western Agency, but we didn't start it and the funding dried up or expired before we could do the project. I wish we could work on it again. Is there a way to reopen the funding and continue the job? Are there ways to control tumbleweeds to keep them from growing after construction jobs? And is there funding for eradicating Russian Olive because we had a few projects to work on them along riparian areas?	Not Substantive. The Plan includes recommendations for prioritizing weeds in rights-of-ways, for both utilities and roads, as well as recommendations for weed species. The BIA recommends reviewing the Plan and working with a local BIA Agency Weed coordinator on specific projects. Funding is available each year, but the BIA needs a proposal for a project as well as a cost share. To control tumbleweeds, there are some preventative measures, such as washing equipment before and after construction, which are outlined in the IWMP as Best Management Practices as well as Early Detection/Rapid Response measures to catch potential invasions early.	No edits made
3	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	What issues have been identified? I'm asking for this specific plan because you have to identify the problem before you come up with a solution. What are the problems here in Tuba?	Not substantive. Noxious weeds impact every habitat on the Navajo Nation, affecting the economic, historic, and cultural livelihood of the Navajo people. The IWMP provides the BIA with a strategic and integrated approach for addressing problematic populations throughout the Navajo Nation. In Tuba City, for example, camelthorn is a major concern and is widespread.	No edits made
4	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	We set aside funding for a beautification project and we're taking down weeds with skidster. We've hired 5 neighbors to manually hoe weeds in Tuba. Are we interfering with this plan? Could it part of the cost share?	Not Substantive. See response to Question #7 as this project could be part of a cost share. The project does not appear to interfere with the plan and likely benefits weed management efforts. We recommend meeting with your local BIA Agency Weed Coordinator to ensure the project complies with other Navajo Nation project planning requirements.	No edits made

No.	Date	Type of Comment	Commenter Name	Comment	Final BIA Response	Edits Made
5	11/17/2021	Question asked at Public Hearing meeting	Mae Franklin	Tamarisk is mostly along the river (Little Colorado River). Due to drought, how much weight does it get in comparison with the other weeds on the list? I hope because it uses a large amount of water, it will get huge attention by NN and BIA.	Not substantive. Tamarisk is a high priority species, especially in stream corridors. When looking at the IWMP, a prioritization strategy is used to evaluate projects based on the weeds being treated and the sites where projects are conducted. While the weeds are categorized in Table 3-1 (A-9 in Appendix A), the order of the species in the list is not an indication of priority within each category. Please refer to the description for the management goals for more information in Section 3.0 of the IWMP. Also, local areas can prioritize their own weed lists based on local concerns for weed management.	Species listed in Table 2-5 have been ordered by prioritization category (i.e. High, Medium and Low) and Management Goal. They are then listed in alphabetical order by common name. This was done to reduce confusion or assumptions that the order of the weeds indicates additional prioritization. A reference is also made to Appendix L where additional information each of the weed species can be found. Other tables updated to reflect the same ordering concern include Table 4-7, Table 4-2, and Table 3-7. In Appendix A. IWMP, Tables 3-1, 9-1, 9-2, and 9-4 were also edited in the same manner.
6	11/20/2021	Question asked at Public Hearing meeting	Carl Etsitty	Are issues being addressed at Black Mesa. One of the big concerns are a lot of impacts and that weeds have been introduced at the PWCC. Are there any other mines, such as Rain Mine or Navajo Mine being addressed for noxious weeds?	Not substantive. The BIA has worked with PWCC on weed management concerns for Black Mesa and other mining areas by working with the lease holders. Any work done in these areas must be done based on established protocols from OSM and Navajo Nation Minerals Department. For additional information, contact these offices for how weed management is incorporated into management of these areas.	No edits made

Comment Theme: Project Planning

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
7	11/20/2021	Question asked at Public Hearing meeting	Tanner Begay	Can grazing official request project planning? Who does the planning for addressing weeds in various areas? Would I have to get Shiprock Agency or can I work on it myself?	Not substantive. Yes, grazing officials and other concerned residents can request a project from a BIA Weed Coordinator at their local BIA Agency office. The Weed Coordinator can determine what planning may be needed and how the Weed Program can assist. Please refer to the Weed Project Checklist in the Integrated Weed Management Plan (Appendix A of the PEIS) for an outline of the project planning process. It is also described in the IWMP in Section 4.0 Implementation Strategy.	A flow chart for weed projects was added to accompany the Weed Project Checklist in Appendix C of the IWMP. The IWMP is provided as Appendix A of the PEIS.
8	11/20/2021	Question asked at Public Hearing meeting	Carl Etsitty	In regards to project planning for weeds, would I request the project plan from Shiprock BIA or do I need to work on one myself to get the weeds addressed?	Not Substantive. Refer to Question #7.	See Question #7.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
9	12/9/2021	Email/Letter	Jean Prijatel, USEPA	According to the Plan, the BIA is required to involve the public in adaptive management by maintaining open channels of communication and providing for post-activity review by the public and other agencies (Plan, pg. A-58). Recommendation: To facilitate monitoring, mitigation, and continued feedback under the adaptive management strategy, consider developing a public website and a standard monitoring and mitigation plan reporting form to track and publish monitoring results. The EPA encourages the BIA to include monitoring and mitigation items which address potential discharges into waters of the U.S., especially wetlands, and status of required permits.	Substantive. The BIA is developing a public GIS website to share information on the location of existing weed populations and projects on the Navajo Nation. This will also provide a streamlined approach for collecting inventory data and assist in project planning. After discussion with related Navajo Nation Programs, the following materials can also be attached to project sites: the project treatment plan, the Navajo EPA approved Pesticide Use Proposal or a weed treatment flyer with information on the herbicide treatment plan, a link to eNOI announcements (if applicable), copies of the approved forest harvest permit (if required), and post-implementation monitoring results. Providing these public documents will serve as another form of public disclosure and notification on projects in conjunction with community meetings and postings to local Chapter Houses and allow for monitoring of mitigation measures and implementation requirements.	Added to Section 6.0 of the IWMP (Appendix A): The BIA Navajo Region plans to develop a website for the Navajo Region's Noxious Weed Program to inform the public on the location of current weed populations, planned projects, and post-project monitoring updates. The GIS features on site will also streamline the data collection process for future weed inventory projects and provide updates on the status of existing populations. The public can use the site for information on planned, current, or past projects, to see the extent of existing mapping efforts, or to report new weed populations as part of the BIA's early detection efforts. Added to Section 9.2 of the IWMP (Appendix A) Education programs on how to recognize noxious weeds may help community members detect infestations when they are still small. Community members can also use the BIA's planned weed program website to report new populations and assist with early detection efforts.
10	12/14/2021	Email	Lee Jim	I believe more of our Navajo medicine people should have been involved. I didn't hear the names of the weeds in question. It seems all plants and weeds travel to different locations. If these are not good for our animals and environment. Thanks for your help.	Not Substantive. The IWMP requires each project to conduct an ethnographic study with community members and local practitioners, including Navajo medicine people, herbalists, and others to identify culturally important plant populations as part of the project planning process. This will identify valuable local plant populations and how to best protect them during projects. The process is outlined in the Mitigation Measures (Appendix F) and in the NNHPD Process (Appendix H). The names of the priority weeds are listed in the Weed Management Plan in Table 3-1 (A-9) and in the Draft PEIS in Table 2-5 (pg. 16), Table 3-7 (pg. 39), and in Appendix L.	Edited Section 4.2.2 for Cultural Control However, because targeted livestock grazing would only be used in Community Development areas and agricultural fields and will be prohibited in waterways, Highly Sensitive Areas, and where sensitive species occur, its potential to affect archaeological and all treatments included targeted grazing, require an ethnographic study of community resources to identify potential TCP resources. Coordinating project specific mitigations to protect TCP resources would reduce potential impacts and loss to local communities. TCP resources would be negligible and the effects may have already occurred if livestock grazing was practiced in these areas in the past.

Comment Theme: Compliance for Projects

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
11	11/16/2021	Question asked at Public Hearing meeting	Roland Small Canyon	Does the BIA still conduct environmental assessments for their work like they did in Shonto to determine how treatments may affect things like carrying capacity?	Not substantive. NEPA compliance is required for any federal action, including weed management. Under the IWMP, all projects must prepare an EA to evaluate site-specific impacts related to each project. The potential impacts of weed management on carrying capacity will depend on whether a project is conducted in a range unit. If a range management plan incorporates weed management, then a rangeland inventory could evaluate potential changes to carrying capacity related to weed management. This step is included in the Weed Project Checklist located at the end of the IWMP in Appendix A and in Section 4.0 of the IWMP.	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
12	12/13/2021	Email/Letter	Kristin Gade, ADOT	We would like to continue to coordinate regarding a programmatic way to receive approval for routine roadside vegetation management. ADOT has existing approvals for vegetation management activities along the roadways we maintain. There are some new requirements for approvals and reporting included in the PEIS/NNIWMP. We would like to establish an approach to streamline the procedures for approvals and reporting related to the Pesticide General Permit and the level of cultural review needed for non-ground disturbing activities such as herbicide application from a vehicle remaining on pavement, mowing, and removal of vegetation using handsaws or chainsaws	<p>Not substantive. BIA met with ADOT to iron out their concerns regarding the PGP requirements and to determine potential ways to streamline the cultural review process. BIA recommends including NNEPA and NNHHPD in these meetings to clarify their requirements for these project planning needs.</p> <p>Per the BIA's meeting with ADOT it was determined that ADOT can develop a streamlined approved with Navajo Nation Programs to address issues related to cultural resources and federal and tribally listed species, similar to how it addresses those concerns now with its program. Additionally, coverage under the U.S. EPA's Pesticide General Permit is only required if treatments are expected to impact waters of the U.S., which ADOT avoids as part of its treatment plans.</p>	<p>Added the following to IWMP Appendix C. Weed Project Checklist:</p> <ul style="list-style-type: none"> IF using herbicide: Any projects using herbicide are required to have a U.S. EPA certified pesticide applicator for the Navajo Nation. Applicator must be available during projects and inspections conducted by the Navajo Nation EPA Pesticide Program. Certified applicators are required for any projects using Restricted Use Pesticides. Submit Pesticide Use Proposals for review and approval of project by NNEPA. PUP must identify the name and license number of certified pesticide applicator and supervised applicators, herbicides being used, application method, and application rate. IF herbicide is applied to a WOTUS: - Submit an eNotice of Intent (eNOI) to the U.S. EPA . . . (same as before). These were added to clarify pesticide permit requirements for NNEPA and U.S. EPA programs for weed projects. <p>Edited in Section 4.4.1.2 under Cultural Control: The use of targeted grazing for cultural control would be limited to Community Development Areas and fenced agricultural fields on the Navajo Nation. Targeted grazing would be limited to buildings and fenced areas where noxious <i>weeds contribute more than 50% of total cover</i>, are common, and where the use of herbicides <i>and other treatments</i> may be a concern.</p>
13	12/14/2021	Email/Letter	Nora Talkington, NNDFW	I'm not sure why Cultural treatments would need to be confined to Community Development Areas. These could occur anywhere with proper consultation and pre-treatment surveys (as needed) to ensure there are no impacts to NESL species. (pg. x)	Substantive. Refer to Question # 29	See response to Question #29.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
14	12/14/2021	Email/Letter	Nora Talkington, NNDFW	I would also like to see a buffer implemented for aerial spraying around important wildlife native riparian species such as willow and cottonwood.	Substantive. Upon consultation with NNDFW, the BIA has added a 300 ft buffer around cottonwood-willow habitats for aerial herbicide treatments. This includes documentation of native plant communities prior to implementation. BIA has added mitigations for aerial spraying to document where cottonwood and willow stands exist so appropriate buffers can be implemented. GPS documentation would also be required to track where aerial spraying occurs. Herbicide treatments should be paired with native plant restoration, which can mitigate potential impacts from herbicide drift from aerial applications.	<p>Added to Section 8.2 for Chemical Treatment Mitigations in the IWMP (Appendix A):</p> <ul style="list-style-type: none"> For aerial herbicide treatments, native vegetation communities in or near treatment sites should be documented with GPS, especially cottonwood-willow woodlands and native sagebrush communities. Native plant communities, such as cottonwood-willow woodlands and native sagebrush communities, require a 300 ft buffer during aerial herbicide treatments. Aerial herbicide treatments should use GPS monitoring to track their position, provide a record of where treatments were done, and to ensure all applicable avoidance buffers are enforced. <p>Added to Table 5 (in Executive Summary) In Vegetation and Areas with Special Designation: Aerial spraying requires a one-mile buffer around tribally listed species <i>and a 300-ft buffer around native habitat, such as cottonwood-willow woodlands and sagebrush communities.</i></p> <p>Added to end of Section 4.3.3.2: Also aerial applications require a 300 ft. buffer around cottonwood-willow and native sagebrush vegetation communities to further protect native wildlife species.</p> <p>Edited Section 4.2.2 for Cultural Control However, because targeted livestock grazing would only be used in Community Development areas and agricultural fields and will be prohibited in waterways, Highly Sensitive Areas, and where sensitive species occur, its potential to affect archaeological and all treatments included targeted grazing, require an ethnographic study of community resources to identify potential TCP resources. Coordinating project specific mitigations to protect TCP resources would reduce potential impacts and loss to local communities. TCP resources would be negligible and the effects may have already occurred if livestock grazing was practiced in these areas in the past.</p>

Comment Theme: Community Outreach

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
15	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	We have a big following (20,000 on social media in Tuba City) and one of our drivers is community outreach. We want to get information and determine what's pertinent to disseminate.	Not substantive. All publicly posted information is available for public distribution.	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
16	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	For the Tuba Chapter area, are there specific plans available to us here at the chapter that I can rely on or we can sit down and work through as a Chapter to see if we need to disseminate this to the community.	Not substantive. Any publicly posted information is available for public distribution. This includes information posted to the BIA's website, on its social media account, or at local Chapter Houses. The plan outlines the approach BIA will take for conducting weed treatments throughout the Navajo Nation. There may be specific projects that take place in or around Tuba City. All projects will be planned and coordinated with the local community, as noted in the Weed Project Checklist in the IWMP. The checklist is found in Appendix A of the PEIS. It is also described in Section 4.0 of the IWMP under Implementation Strategy. Contact your local BIA Noxious Weed Coordinator for more information in your area.	No edits made.
17	11/17/2021	Question asked at Public Hearing meeting	Leslie Williams	The proper way to do thing, is to go to the local people and get them together to do things. I've brought this up to my Chapter many times and it's not been done, and we need to understand this from both sides.	Not substantive. Community involvement is an important component for planning weed projects and one the BIA has included as part of project planning. Each project should consider the needs and concerns of the community when planning projects, as indicated in Section 4.0 of the IWMP. The IWMP would require the BIA to meet with local community members to determine their goals and needs for weed removal, identify areas where plants may be used for cultural activities, and understand community concerns or hesitancy with specific treatment methods. This is also outlined in Weed Project Checklist in the IWMP. The checklist is found in Appendix A of the PEIS.	Edited Section 4.2.2 for Cultural Control However, because targeted livestock grazing would only be used in Community Development areas and agricultural fields and will be prohibited in waterways, Highly Sensitive Areas, and where sensitive species occur, its potential to affect archaeological and all treatments included targeted grazing, require an ethnographic study of community resources to identify potential TCP resources. Coordinating project specific mitigations to protect TCP resources would reduce potential impacts and loss to local communities. TCP resources would be negligible and the effects may have already occurred if livestock grazing was practiced in these areas in the past.
18	11/18/2021	Question asked at Public Hearing meeting	Wynette Arviso	Would be possible to do a meeting or get the land use planning committees to attend these sessions or do a session specific to the LUP committees for each Chapter. Each Chapter has an LUP committee, and they could attend and share this with community members.	Not substantive. BIA has reached out to the Navajo Nation Division of Community Development to assist with notifying the Land Use Committees about this project. Land Use Plan can incorporate the IWMP in their documents by citing the Plan and indicating that weed management activities will be done based on the methods and project planning requirements outlined in the IWMP.	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
19	11/20/2021	BIA website	Norman Benally	I would like greater public notices informing the public via the media available on this action by the BIA. While a lot of comments may be repeated, it should be counted as such. While many well complain they were never informed, therefore the comment period should be extended as well.	Not substantive. The BIA decided not to extend the public review period for the Draft PEIS. The BIA advertised the comment period using radio and print announcements, as well as regular communications with the Navajo Nation Council, Navajo Nation Division of Community Development, NN Division of Natural Resources, Grazing Officials, and District Grazing Meetings to inform the public about the review period for the Draft PEIS and the IWMP. Media announcements ran for 1 week and print announcements ran for 2 week starting October 15, 2021. The Navajo Nation President and Speak of the House were notified about the Public Review period with a formal letter on October 26, 2022. Council Delegate Thomas Walker also announce the Public Hearings at the Navajo Nation Council NABI session on November 18, 2021 following an email from BIA NRO on November 17, encouraging attendance. All comments submitted have been considered.	No edits made.

Comment Theme: Weed Treatment Methods

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
20	11/17/2021	Question asked at Public Hearing meeting	Mae Franklin	Biological control has been applied, are we done as a treatment of Tamarisk along the LCR? Is that it?	Not substantive. BIA has not conducted biological control of tamarisk as there is a moratorium on the use of tamarisk leaf beetle by APHIS, so it is not considered an approved biological control agent. The BIA is aware of the impacts of the beetle on the Navajo Nation and is monitoring its range and impacts. Tamarisk is considered a priority weed species due to its impacts along water ways on the Navajo Nation. There are several effective management options for treating tamarisk depending on the density, location, and size of treated populations. Best options for treatment are outlined in the IWMP (Appendix A) in the Best Option for Control Appendix (Appendix E of the IWMP).	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
21	11/20/2021	Question asked at Public Hearing meeting	Tanner Begay	Is BIA using a lot of herbicide that would kill a lot of the native species of plants or trees where they are spraying those herbicides? Also, will burning be used on grazing land to promote healthy species and plant and if that was listed in the document.	<p>Substantive. Use of herbicide under the IWMP requires implementation of several mitigation measures as outlined in Appendix F. These will limit the amount of herbicide used. Additional planning measures are outlined in Question #32. Further, the use of any herbicide is limited by its label requirements. These requirements include the maximum amount of herbicide that can be applied within a given time period, which limits how much herbicide can be applied during each application and over a given period of time. Herbicide applicators and project sponsors are required by law to abide by these requirements (40 CFR Part 156).</p> <p>Burning is included as a mechanical control method in the IWMP to reduce or limit the growth of noxious weeds and is described in Section 9.4 of the IWMP. However, it is not being used to restore native plants nor is it proposed as a method for rangeland management, which is outside the scope of the IWMP. Burning can be used to control the growth of some noxious weed species or to remove treated or dead plant material. Burning may be used for prescribed burning treatments or pile burns and must comply with Programmatic Wildland Fire Prevention Plan for the Navajo Nation.</p> <p>Underlying the concern noted here is the potential impacts that certain treatment methods can have on native plant species or local residents. Treatment plans should take these concerns into consideration when selecting treatment methods. This includes an analysis of potential environmental and human impacts for treatments and selecting treatment methods that prioritize the least harmful but most effective methods where possible. This information has been added to the IWMP in Section 9.0.</p>	Added to Section 9.0 of the IWMP (Appendix A): “Treatment method selection should consider several factors. Local community engagement should identify public health concerns, economic impacts, cultural resources (such as plant collection areas), and community-based goals for removing the infestations. Impact to natural resources such as sensitive plant and animal populations, soil erosion, and water quality, should also be evaluated. Projects should determine, based on the size, density, and the specific weed species, a reasonable level of treatment needed to reduce the population while minimizing impacts. For example, widespread but patchy clusters of yellow starthistle may be controlled with less intense treatments such as biological control or targeted grazing while dense isolated populations of Canada thistle may require more intensive mechanical removal followed by chemical treatments. Treatments should also prioritize the least harmful methods where possible by using the least toxic herbicide available for treating the targeted weed species (Appendix E) paired with other control methods to reduce the amount of herbicide needed to effectively reduce and minimize regrowth. These considerations ensure that projects address a wide array of concerns while maintaining treatment effectiveness through a multi-faceted and integrated management approach.
22	11/20/2021	Question asked at Public Hearing meeting	Carl Etsitty	As far as biological control goes, these agents are really specific to the agent it is, and they don't really go after other non-target species so usually they will drop back down to background levels. They don't really disappear as no biological entity will really do that. What kind of determination was made to make Alternative 3 no biological control?	Not substantive. NNDFW requested Alternative 3 during Public Scoping. NNDFW cited its policy with Arizona Game and Fish preventing the introduction of non-native fish on the Navajo Nation. Table 4 in the Executive Summary of the Draft PEIS provides a comparison of impacts anticipated for Alternative 2 and 3, which will inform BIA's decision. The BIA is considering the use of biological control only under Alternative 2. The Alternatives outlined in the PEIS indicate the options the BIA is considering addressing the Purpose and Need of the project. It does not indicate which alternative the BIA has selected. This will be provided in the Record of Decision provided by the BIA after the Final PEIS is released.	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
23	11/20/2021	Question asked at Public Hearing meeting	Marge Lantana	How will this affect livestock that graze in open range if chemicals are used to treat weeds or insects? Is it going to be done spraying using helicopters?	Not substantive. Livestock would be deferred from range units where chemicals are sprayed. There are also restrictions limiting aerial applications to using aquatic herbicides only, which reduces their potential impacts to wildlife and livestock after treatment. Rangeland areas should also be fenced to prevent and limit exposure to wildlife and other roaming animals. Please refer to Section 3.6 and 3.7 in the PEIS for more detailed information on potential impacts to wildlife and livestock.	No edits made.
24	11/20/2021	Question asked at Public Hearing meeting	Tanner Begay	Russian Olive is a very invasive plant in the Lukachukai Chapter and one of the concerns that I have is that Russian thistle and I saw that herbicide was to be used to treat it. It did state that for the control of some grasses and Russian thistle, does that mean the vegetation we want to remain on those lands that that herbicide [chlorosulfuron] will kill that grass also?	Not substantive. All herbicides carry the risk of impacting native vegetation when applied. However, the use of Best Management Practices can limit and reduce these impacts. These include spraying only when weather conditions do not contribute to drift, surveying for native plant populations prior to treatment, and monitoring the use and application of herbicide. The BMPs also require native plant restoration after all treatments, which can restore plant communities impacted by herbicide drift. The use of herbicide should be limited, with preference given to other control methods and the least toxic herbicides for the project. Project planning is needed to ensure that the most appropriate application method is used based on site-specific resources and concerns. These are outlined in the mitigation measures included in Appendix F of the Draft PEIS. Where necessary, Table 9-4 in the IWMP (Appendix A) can be used to select herbicides based on the weed species being targeted along with Appendix E to select the best management strategies by weed species and based on the less harmful herbicide. Further the BIA will include a method for prioritizing herbicide based on toxicity.	Table 4-8 of the Draft PEIS was reordered from lowest to highest toxicity based on oral exposure, which was added to Appendix E of the IWMP. Added to Section 9.7 of the IWMP (Appendix A): <i>Use of herbicides can include concerns about human health, ecological risks, and potential impacts to native plants and animals. Projects using herbicides should always be paired with other treatment methods to (1) improve their effectiveness and (2) reduce the potential for harmful impacts. If more than one herbicide can be used for a project, treatments should prioritize the herbicide with the lowest toxicity. Herbicides are listed by toxicity in Appendix E.</i>
25	11/20/2021	Question asked at Public Hearing meeting	Tanner Begay	Using the chlorosulfuron on rangeland to address Russian thistle, will release of an herbicide like this affect native plants that cow, horses, and goats or is it just for that, I know it does say annual grasses and I wasn't sure on the answer.	Not substantive. Refer to Question #44. Additionally, the application rate (0.0625 pounds of active ingredient per acres) is well below the toxicity rate for this herbicide. Modeling done by U.S. Forest Service (SERA 2016) demonstrates that chlorsulfuron, when used as directed by its label, should not be harmful to large or small mammals in treated areas. This information was incorporated into the document by reference. Lastly, each project should select the treatment methods that are most appropriate based on-site conditions and the weed species treated. This includes the use of the best management options (Appendix G), selection of effective and appropriate herbicides (Table 9-4 in Appendix A), and use of the least effective herbicide where possible (based on Table 4-8).	Herbicides in Table 4-8 of the Draft PEIS are ordered from lowest to highest toxicity based on oral exposures. A note is added that the table can be used to select herbicides based on lowest toxicity and most effective herbicide for treatment. The table was also added as Appendix E in the IWMP (which is Appendix A in the Draft PEIS)

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
26	11/20/2021	Question asked at Public Hearing meeting	Fannie Lookingglass	I've noticed in some homes and some places, there's the growth of bullheads around them and extending away from the homes. What are some possible ways to get rid of it? I noted in past years when there was a bad drought and we didn't get any rain, these things didn't really grow but then after the last floods we had over the summer, these bullheads started multiplying again and growing vigorously in many areas. What is the best ways to treat that without endangering animals and human life because I know they grow close to the house? The best way I know is to hoe them, but then they multiply them away from home	Not substantive. For bullhead, it is best to treat when young and before they flower. Hoeing and pulling is recommended to treat sizeable populations. Plants should be removed, bagged, and disposed of at the local solid waste transfer station as remaining plants can germinate. The seeds can also remain on sites for long periods of time, so removal of seeds from plants, shoes, and equipment is needed to prevent new infestations. The BIA Noxious Weed Coordinators can provide information on noxious weed management and control in coordination with Cooperative Extensions' weed specialist. For other specific weed treatment recommendations, refer to Appendix G in the Draft PEIS for the best management option by species.	No edits made.
27	12/21/2021	Email	Annarita Begay	I am currently dealing with some very hard to maintain invasive weeds in our lease acreage for farming that is hindering our ability to farm the land. How can I get more information on your program? I have just found your comment and question time has been closed for the project please shoot me any information on how I can get signed up on the program. I was initially looking for assistance in burning out the field areas but with the fire restrictions I was wondering if it was possible.	Not substantive. Refer to Question #7 for information on contacting the Noxious Weed Coordinators and Question #21 for burning. Appendix G also outlines specific techniques by weed species for the best management options.	No edits made.
28	12/14/2021	Email/Letter	Nora Talkington, NNDFW	I agree with this statement! NNHP encourages reseeding temporary disturbance areas with a native species mix to reduce erosion and discourage weed infestation. We are also recommending NTUA uses "best management practices" to reduce transport of weeds by cleaning equipment, using weed free water for dust abatement, and saving topsoil for reclamation. (Pg. 7, referring to ROWs))	Not Substantive. The BIA supports the use of Best Management Practices by other agencies to help reduce weed spread and growth.	See Edits made to Item #29.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
29	12/14/2021	Email/Letter	Nora Talkington, NNDFW	There is evidence that goat grazing is effective for Tamarisk Control: https://www.webpages.uidaho.edu/rx-grazing/WoodyPlants/Salt_Cedar.htm . I think that targeted grazing for Tamarisk and Russian olive should be considered as a cultural control within riparian areas, with proper EPA and NNHP consultation. If done correctly, there would be a temporary disturbance to water quality/ habitat, but the goat treatments could be followed up seeding or planting native species once weeds are controlled which would be a net benefit to the system. (Table 2-4. pg. 13)	Substantive. BIA met with NNDFW to iron out the changes to this specific request. In the Draft PEIS, targeted grazing was limited to Community Development Areas and agricultural areas. After consulting with NNDFW, targeted grazing can be used in other priority weed areas. However, targeted grazing would require additional consultation with NNDFW and NNEPA to ensure project specific mitigations, monitoring requirements, and project planning needs to ensure impacts are limited to water quality, cultural resources, vegetation, and soils. Targeted grazing would not be permitted in Highly Sensitive Areas and listed species habitat. Highly sensitive areas are identified and defined by NNDFW in their RCP policy and on their website (nndfw.org). Potential and suitable habitat for federally and tribally listed species and occurrence data is based on NNDFW data and is provided to project sponsors as part of the Biological Resource Compliance Form process outlined in Section 7.0 of the IWMP. It is also outlined in the Weed Project Checklist in the IWMP (Appendix A).	Original Sentence in Table 2-4: Targeted grazing will only be used in Community Development Areas, and agricultural fields and will be prohibited in waterways, Highly Sensitive Areas, and where sensitive species occur. NEW SENTENCE IN TABLE 2-4: Targeted grazing will be <i>focused in Community Development Areas and agricultural fields</i> and will be prohibited where federally or tribally listed species occur. <i>Its use in other areas, such as rights-of-way and riparian areas requires additional consultation with NNDFW and NNEPA. All projects will requirement some level of native plant restoration following removal of noxious weed species.</i>
30	12/14/2021	Email/Letter	Nora Talkington, NNDFW	I think targeted grazing should be considered outside these [CDAs] areas including riparian areas with consultation with NNHP to ensure no impacts to NESL species. (pg. 95, Sec 4.4.1.2)	Substantive. Refer to Question #29.	See Edits made to Item #29.
31	12/14/2021	Email/Letter	Traci Metzner	I do not support Alternative 3, no biological control, as I believe that the use of USDA APHIS approved biological controls are necessary. These insects and pathogens are specifically targeted toward the invasive weed species and are deemed effective by the USDA for their ability. The Navajo Nation Department of Fish and Wildlife (NNDFW) cites Louda et al. ³ as evidence that these insects and pathogens can not only affect their targeted species but closely related non-targeted species, which is why they have requested a plan to be created without biological controls. However, the evidence in Louda et al. is outdated and limited, with only three case studies, the most recent being over 50 years ago. The evidence in support of the efficacy of biological controls is substantial. And if the list of the 45 noxious weed species referenced in the PEIS is compared to a list of the 35 endangered plant species ⁴ compiled by the NNDFW, it is clear there is very little overlap in closely related species. Therefore, the potential threat to non-targeted species should be minimal.	Not substantive. Refer to Question #22.	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
				<p>Biological control has successfully been used to control several knapweed species in Colorado⁵, Montana⁶, and Arkansas⁷; the same knapweed species that have also been listed as noxious weeds in the Navajo Nation. While I understand that there is little data on biological controls' effect on non-targeted species, and those are the few cases on which Louda et al. focuses, I believe that the benefits outweigh the risks. And as long as there is continued monitoring of these areas in which biological controls are used, the risks will be minimal. If Alternative 3 were to be put into action, the use of chemical controls in lieu of biological control of these species could cause water contamination if used near water sources, as well as negative effects on the wildlife and people relying on those water sources (as outlined in the PEIS).</p> <p>Due to this data, I strongly support Alternative 2 for the NNIWMP. As I have stated above, I believe the concerns surrounding biological controls to be minimal. And if the full management plan can be implemented, that is an increase of 50,000 acres that can be treated over the 10 years in which the plan will take place. This is such a large difference that the benefits outweigh the potential risks.</p> <p>Therefore, it is my opinion that Alternative 2 is the best option to effectively control the noxious weeds on the Navajo Nation. The concerns regarding biological controls negatively impacting native or endangered species are outdated, and as long as they are addressed regularly with the NNDFW, should not be excluded based on a handful of examples where problems arose. As the goal of this proposed weed management plan is a more organized and cooperative system, that cooperation will be necessary to assuage any doubts regarding biological controls.</p>		

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
32	12/9/2021	Email/Letter	Jean Prijatel, USEPA	The Navajo Nation Integrated Weed Management Plan and Draft PEIS include objectives for effectiveness, adaptive management, and community coordination and education, among others. The Plan does not appear to include an objective for using less-toxic chemicals or minimizing the use of chemical methods, as is typical of an integrated management approach. The EPA encourages consideration of Integrated Pest Management principles,1 to minimize the use of chemicals when possible. Recommendation: To reduce the risk of undesirable environmental and human health effects from the use of herbicides, modify the Navajo Nation Integrated Weed Management Plan to prioritize the use of lower risk management methods within the adaptive management approach. Commit to using broadcast spraying of non-specific pesticides only as a last resort.	Substantive. The BIA evaluated the recommendations provided by the U.S. EPA. The BIA has incorporated some measures to prioritize the use of non-herbicide techniques and further prioritize the use of multiple weed management methods, which will reduce the overall use of herbicide while increasing treatment effectiveness. The BIA will further prioritize the use of less toxicity herbicides when planning treatments. These are outlined in Section 9 of the IWMP, Section 2.1 of the PEIS, and the Best Options for Control in Appendix G of the PEIS. The BIA used the information in Table 4-8 to rank each herbicide as a way to prioritize herbicide selection based on toxicity. It has also been added to Appendix E of the IWMP along with best management option for each noxious weed. Appendix G of the PEIS outlines the best control option for each of the listed weed species, which identifies which control methods are most effective for each species.	Added to Section 9.0 of the IWMP (Appendix A): Method selection should take several factors into consideration when developing treatment plans. Local community engagement should identify public health concerns, economic impacts, cultural resources (such as plant collection areas), and community-based goals for removing the infestations. How treatments may impact natural resources such as sensitive plant and animal populations, soil erosion, and water quality, should also be evaluated. Projects should determine, based on the size, density, and the specific weed species, a reasonable level of treatment is needed to reduce the population and while minimizing impacts. For example, widespread but patchy clusters of yellow starthistle may be controlled with less intense treatments such as biological control or targeted grazing while dense isolated populations of Canada thistle may require more intensive mechanical removal followed by chemical treatments. Treatments should also prioritize the least harmful methods where possible by selecting non-herbicide techniques where feasible and using the least toxic herbicide available for treating the targeted weed species (Appendix E) while pairing with other control methods to reduce the amount of herbicide needed to effectively reduce and minimize regrowth. These considerations ensure that projects address a wide array of concerns while maintaining treatment effectiveness through a multi-faceted and integrated management approach. Added to Section 2.1.1.2 of the Final PEIS: Selection would be based on the most effective treatment methods and those that reduce or prioritize non-chemical methods. All projects should include native plant restoration when removing noxious weeds.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
33	12/9/2021	Email/Letter	Jean Prijatel, USEPA	Potential cumulative impacts could occur if herbicide use under the Plan occurs in combination with use of herbicides by people in the community in which they are applied. The Plan and Draft PEIS conclude that such impacts can be managed via required public notification; however, it remains unclear how effective this will be in preventing cumulative impacts. Although the Draft PEIS expects that project-specific Environmental Assessments will be prepared and the “Weed Project Checklist” in Appendix C of the Plan includes notification at least a week prior to treatment, a considerable variety in public participation can occur under NEPA EA processes and gathering information from potentially affected communities could be improved beyond simple notification. Recommendation: In a revised Plan attached to the Final PEIS, add checklist items for project-specific planning to address the following: • Solicit information about current and planned herbicide use within the project’s community. • To address questions or concerns with specific projects, include a means of contact, such as a phone hotline or email address, in required notifications that will be posted.	Substantive. The planning guidance outlined in Section 7.0 and the Weed Project Checklist of the IWMP requires close coordination and consultation with local communities. The BIA has added the gathering of information on previous projects and weed management efforts as part of the project planning process and community coordination efforts in the Weed Project Checklist (Appendix C in the IWMP). However, given the lack of access and use of internet-based communication on the Navajo Nation, the BIA finds coordination with local Chapter Houses, District Grazing and Farm Boards, and Land Boards to be an effective means of notifying and meeting with local community members for projects. This also includes posting flyers and mailing letters to notify the public about projects. These outreach efforts and community coordination efforts are also described in Section 4.0, Section 7.0, Section 8.0, and the Weed Project Checklist appendix in the IWMP.	Added to Section 9.0 of the IWMP (Appendix A): Method selection should take several factors into consideration when developing treatment plans. Local community engagement should identify public health concerns, economic impacts, cultural resources (such as plant collection areas), and community-based goals for removing the infestations.
34	12/9/2021	Email/Letter	Jean Prijatel, USEPA	Section 7.0 of the Plan, on Permitting, includes a description of the EPA requirement that “Restricted Use Pesticides” must have certified pesticide applicators; however, it is not clear how this will be enforced. Recommendation: Consider measures to explicitly require certified applicators of “Restricted Use Pesticides” in project planning and monitor whether this requirement is met in adaptive management for the Plan, including potentially adding this in the “Weed Project Checklist.”	Substantive. The BIA added language to the Weed Project Checklist of the IWMP requiring a certified applicator when the use of Restricted Use Pesticides is proposed. The PUP application process with Navajo Nation EPA also requires identification of the certified pesticide applicator who will supervise application. NNEPA requires a certified applicator when a Restricted Use Pesticide is used. They also provide enforcement through project inspections, which include checking the credentials of the certified applicator overseeing the project. BIA also added their internal project planning forms to Appendix K of the IWMP to outline their planning process and requirements for the use of pesticide on the Navajo Nation. The Work Plan form in Appendix K includes identification of the state or tribal herbicide certifications for projects.	Added to Section 9.7 Chemical Control of the IWMP: All herbicides will be used according to their labels and a Navajo Nation Certified Pesticide Applicator <i>must</i> be on site. Added to Weed Project Checklist in Appendix C of the IWMP: Any projects using herbicide are required to have a U.S. EPA certified pesticide applicator for the Navajo Nation. Applicator must be available during projects and inspections conducted by Navajo Nation EPA Pesticide Program. Certified applicators are required for any projects that use Restricted Use Pesticides. Additionally RUPs have been noted in the following table of the IWMP: Table 9-3 and 9-4.

Comment Theme: Land Use Plans

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
35	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	How long does it take to make a weed management plan? If the plan cost is more than \$100,000, should it be inserted into the Navajo WIND System? Should the weed management plans be inserted in the land use plans?	Not Substantive. Site specific projects and plans take about two years to develop. The IWMP was developed using only federal funding, and thus does not need to be reported in the Navajo WIND system. The BIA encourages the incorporation of the IWMP in Community Land Use Plans or any other Navajo Nation resource management plan. This can be done by referencing the plan and developing treatment project based on the mitigation measures and requirements described in the IWMP.	No edits made.
36	11/18/2021	Question asked at Public Hearing meeting	Wynette Arviso	In implementing this IWMP, how can we incorporate this with our conservation plans for these range units?	Not substantive. Other Resource Management Plans can reference the IWMP and includes a section on weed management to incorporate it. The plan can be referenced by its document number or title. For example, the NPL Agricultural and Range Resources Management Plan from 2018 is EA-19-36076.	Added to the end of Section 4.0 of the IWMP (Appendix A.): <i>Additionally, this plan can be incorporated into other land management projects or plans by citing either its BIA NEPA Reference Number (#####) or by an in-text citation (i.e. BIA 2022). By incorporating this plan, it is agreed that the subsequent plans or projects will abide by the methods, planning requirements, and mitigation measures outlined in the NNIWMP.</i>
37	11/29/2021	Letter	Allen Nockideneh	There is a small percentage of land users that need a change in our management practices and are asking for Alternative II to be written into our Conservation Plan to defeat the spread of noxious weeds. My vision is to approve a living document that the Navajo Nation IWMP will abide by the rules and regulations governing all tribal/allotment trust lands.	Not Substantive. Refer to Question # 35 on how to incorporate the IWMP into other resource management plans.	See Question #36.

Comment Theme: Funding and Cost Share

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
38	11/17/2021	Question asked at Public Hearing meeting	Leslie Williams	Even though the officials are informed about this initiative, when we talk to the people, they want to know if they will be obtaining funding from them. They want to know how the process will work. Can you talk about cost-sharing? NRCS assist us and share some project. How long will it take to pay back the funding? If you can explain this carefully to the people, they can understand it and that it's a slow process. If a project is done in their presence and they can witness it, then they will understand. To them, if the plants are sprayed and treated, will they be fed stuff instead? You haven't really informed us of this yet. Explain this to the people, they can understand it and it's a slow process.	Not substantive. The BIA is open to cost-sharing and recognizes its benefit. However, the comment is outside the scope of the environmental analysis.	Added Appendix K. Project Planning Forms (BIA Only) to the IWMP which provides information on the criteria used for projects funded through the BIA Invasive/Noxious Weed Funding Program.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
39	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	Can you give an example of a cost share?	Not substantive. Refer to Question #67. One example of a cost share was for a weed project conducted by Western Navajo Agency for RMU 814. This project was done in coordination with NRCS, who prepared the Environmental Evaluation and provided financial support to producers to defer cattle from the treatment site for 4-5 years. The producers at the site build fencing around the site and NNDWR provided technical assistance for water drilling and soil stability monitoring. NNDA provided funds for herbicides while Dine College provided students to install soil erosion structures at the site. Each of these additional contributions were considered cost shares for this project.	No edits made.
40	11/17/2021	Question asked at Public Hearing meeting	Walter Phelps	Is the Program sustainable now for this year and the next fiscal year because of ARPA funds and COVID funds and all these extra federal dollars pumped into federal agencies, even for personnel and hiring additional help? Are there sufficient funds that the BIA is working with now? Do the funds meet what is needed to work with?	Not substantive. Funding for this Program is specific for noxious weed projects for BIA. It's allocated to through the BIA Invasive Weed Program each year for projects outside of BIA base funding. All BIA Regions compete for the money for projects. These funds are not affected by the recent COVID or emergency funds.	See Question #38.
41	11/17/2021	Question asked at Public Hearing meeting	Leslie Williams	We're talking noxious weeds that livestock don't use, the question is, if it is eradicated and grazing plants are replanted and it's done, will there be funding attached to it.	Not substantive. Noxious weeds, as described in the IWMP, are non-native plants that "have negative impacts on desired native plants and wildlife (pg. A-1). Not all noxious weeds are avoided by livestock, but they may negative affect rangelands used by livestock, as described in Section 3.7.1 of the PEIS (pg. 56). All projects require native plant restoration, as noted in Task 5 of the Implementation Strategy (Section 4 of the IWMP), Section 8.4 of the mitigation measures of the IWMP. One of the intents behind the IWMP is to assist with project planning and development weed projects, which can be funded under the BIA's Invasive Species/Noxious Weed Program. Funding requirements for this Program are described in the Appendix K of the IWMP. Working with a BIA Noxious Weed Coordinator to develop a treatment plan for a specific population can also allow the BIA to apply for funding for projects through this Program.	No edits made.
42	11/17/2021	Question asked at Public Hearing meeting	Nelson Cody	Have all the funds (\$3.8 million) been committed to projects or there still an opportunity or future deadline for when to review proposals and present projects? The annual funding vs. the new infusion of additional funds (COVID vs. ARPA or stimulus funds approved by Congress)? Because there are monies going to the tribes directly and those going to the federal agencies?	Not substantive. The funding provided for noxious weed projects is not connected to COVID or ARPA funds. They are provided annually through the BIA Invasive Species/Noxious Weed Funding Program. See Question #40 and #41 for more information on the process. There is also a project checklist for how to plan and project and request funding through the BIA Noxious Weed Program. (Appendix C in the IWMP).	See Question #38.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
43	11/18/2021	Question asked at Public Hearing meeting	Wynette Arviso	Will funding be available for implementation of this plan?	Not substantive. Funding is available through BIA Invasive Species/Noxious Weed Funding Program. These funds are provided annually and competitively to support weed management projects for all BIA agencies. Information on the Program is provided in Appendix K of the IWMP.	See Question #38.

Comment Theme: EIS and IWMP Tables and Figures

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
44	11/18/2021	Question asked at Public Hearing meeting	Wynette Arviso	For Table 3.1, the list of invasive weeds. It would be helpful and really good if the Navajo names are also included as well as pictures.	Not Substantive. Appendix L has a table with more detailed information on each of the noxious weed species, including all available Navajo names and photos of the priority weed species. The BIA used the Navajo names for the plants as provided by the NMSU Selected Plants of Navajo Rangelands website [https://navajorange.nmsu.edu/]. Some invasive weeds do not have Navajo names associated with them, and thus are not provided.	A note was added to the caption for Table 3-1 and 2-7 that additional information on each weed species can be found in Appendix L. Added to Section 3.0 of the IWMP: Information, including photos, names, and management concerns for each species can be found in Appendix L of the PEIS associated with this Plan.
45	11/18/2021	Question asked at Public Hearing meeting	Wynette Arviso	The maps are difficult to read. One talks about development areas and you can't really tell because the agency colors are so strong. The maps starting on page 71-74 need improvements.	Not substantive. The BIA will adjust the map colors to make them easier to read.	BIA has adjusted the colors of the maps for the Priority Weed Areas in Appendix B of the IWMP. The agency colors were lightened, and the colors used for the priority areas in each map were adjusted to make them easier to see.
46	12/14/2021	Email/Letter	Nora Talkington, NNDFW	Why is this [tamarisk] also in the eradicate column? Seems pretty unlikely, at least in the short-term (Table 2-5, pg. 15)	Not substantive. Management of diffuse knapweed is focused on containment and long-term eradication. Long-term eradication means efforts will aim to eliminate the species from a project area over several years with the understanding that different sized populations may be found in different areas. Some populations may be controlled in a manner that may eventually achieve eradication in the project area (IWMP pg. A-8).	The textbox that describes the Treatment emphasis and Management Goals for each weed category was revised. Treatment emphasis for Category B species was changed from "Eradication" to "Local eradication."
47	12/14/2021	Email/Letter	Nora Talkington, NNDFW	<i>Speyeria nokomis</i> is misspelled for Washington Pass Silverspot Conservation Area (Table 3-21, pg. 72)	Not substantive. BIA will correct the type and will double check to determine if name is Washington Pass or Narbona Pass.	BIA has corrected the typo and changed the name of the biological preserve to the Narbona Pass Silverspot Conservation Area
48	12/14/2021	Email/Letter	Nora Talkington, NNDFW	Non-sensical sentence for first paragraph on pg. 93.	Not substantive. The BIA will revise the sentence.	Edits on pg. 93 to: <i>How vegetation is impacted will differ by Alternative.</i>

Comment Theme: Economic and Environmental Impacts

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
49	11/20/2021	Question asked at Public Hearing meeting	Carl Etsitty	Have the economic or environmental impacts on subsistence practices been addressed or has it been looked at?	Substantive. The BIA did look for information to assess impacts to informal economic activities on the Navajo Nation, including subsistence practices. The best available information on this subject is addressed in sections Section 3.9.1 of the PEIS. A sentence was added to this section to highlight the lack of information on informal economic activities.	Added to Section 3.9.1 on Economic Setting: <i>Other informal economic activities, such as flea markets, artisanal sales, and bartering for goods, may also contribute a considerable portion of economic support to Navajo residents, but their contributions are often understudied and the size of such contributions are unknown (Diné Policy Institute 2018)</i>

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
50	11/20/2021	Question asked at Public Hearing meeting	Alicia Chee	Are there social, economic, or environmental concerns. Are we looking at more Dust Bowls from weeds combined with weather, land erosion, or flooding?	Not Substantive. Social, economic, and environmental concerns and impacts are outlined in the Draft PEIS. The goal of the plan is to address noxious weed populations and their impacts to the environment, communities, and resources.	No edits made.
51	12/9/2021	Email/Letter	Jean Prijatal, USEPA	Appendix F to the Draft PEIS, Mitigation and Species Conservation Measures, is cited for Best Management Practices to avoid and reduce impacts from implementing projects under the Plan; however, it does not appear to include measures for mitigating air quality impacts aside from those due to pesticide drift. Potential air quality impacts could occur from use of on and off-road engines, surface disturbance and burning practices. Recommendation: In the Final PEIS and revised Plan, include consideration of measures to avoid and reduce air quality impacts, especially related to particulate emissions. Such measures could include the following: • Smoke Management Plans for the area - Describe threshold weather conditions considered for prescribed burns and public notice requirements. • Best management practices (BMPs) to limit truck and equipment idling on site, including enforcement of idling limits. • Require advanced pollution controls and clean fuels for new equipment, and for older equipment to be retrofitted. Use particle traps and other appropriate controls to reduce emissions of diesel particulate matter and other air pollutants. Traps control approximately 80 percent of DPM, and specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions. 3 • Lease or buy newer, cleaner equipment (1996 or newer model).	Substantive. Currently the BIA is limited in how it can purchase vehicles and equipment as all purchases must be done through the General Services Administration (GSA). The BIA relies on the GSA to provide fleet vehicles and heavy equipment that meet current federal emissions guidelines, as well as the potential for pollution controls and use of cleaner fuels. Ultimately, the BIA does make efforts to improve fuel efficiency and limit emissions, but the options available are largely governed by those available through the GSA. There are also limitations on how old equipment must be, which would limit and prevent the use of higher emitting items. A mitigation measure has been added to limit idling during projects. Any treatments that use burning to treat noxious weeds or remove treated materials must comply with the Programmatic Wildfire Prevention Plan for the Navajo Nation. This Plan requires that any burn treatment must include modeling and planning measures for smoke. Smoke patterns are modeled based on fuel composition and predicted weather patterns from NOAA. The models are used as part of the BIA Fuel's Programs Go / No-Go Decision-Making tool for determining when treatments can be conducted. Smoke information is also included in all public notices prior to and during treatments.	Added to Section 8.1 of the IWMP: Vehicles and equipment should be turned off if periods between use are longer than 15 minutes. Added to Section 4.3.3 intro: Burning would be used by all alternatives and must follow the BIA's current protocols to reduce impacts from smoke and impacted air quality, including development of a burn plan in compliance with NNEPA and the BIA's Wildfire Prevention 10-Year Plan for the Navajo Region (BIA 2018). This includes smoke modeling, coordination with regional fire support programs, and restricted seasons for when fire treatments can occur.
52	11/20/2021	BIA website	Norman Benally	I would like to see a greater emphasis on surface water, soil conservation and revegetation of native plants, Integrated weed management should only be a part of that! I believe we lose billions of gallons of surface water downstream every storm season to the detriment of the Navajo people and an unfortunate benefit to downstream users.	Not substantive. These issues and concerns are addressed in the Draft PEIS. Soils and surface water impacts are assessed in Section 3.4 and 4.3 of the Draft PEIS. Native plant restoration is described in Section 10 of the IWMP (Appendix A).	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
53	11/11/2021	Letter	Graham Zephirin	I am concerned about the impacts of herbicides on local aquatic systems. Not only are aquatic ecosystems very rare in occurrence on this landscape, but their inhabitants are among the most fragile when it comes to herbicides. Roundup has been shown to reduce survival and overall biomass in tadpoles by 40% (Relyea et al. 2005). If we are losing 40% of all amphibian biomass on an annual basis, it won't be too long until these waterways are completely devoid of these creatures. Obviously, the goal of this proposal is to help restore and preserve natural history, so I think destroying amphibian diversity should be treated as a worst-case scenario and that great care should be taken to avoid this.	Not substantive. The IWMP does outline protections for aquatic habitats and open water in Sections 8.2 and 8.3 of the IWMP and are discussed in Section 4.3.2 of the PEIS. The paper cited in the response (Relyea et al. 2005) is considered in the analysis of amphibian wildlife species in Section 4.5.1.2 (pg. 106). Overall, the mitigation measures (Appendix F) for treatments in or near open water include use of integrated methods that reduce the overall use while improving treatment effectiveness, and use of aquatic-only herbicides within 25 ft. of open water and herbicides that are non-toxic to aquatic organisms within 300 ft of open water should reduce potential impacts to amphibians. Additionally, projects must consult with Navajo Nation Department of Fish and Wildlife to identify and reduce potential impacts to species of concern, including amphibian species of concern.	No edits made.

Comment Theme: Cooperating Agencies

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
54	12/14/2021	Email/Letter	Nora Talkington, NNDFW	The management for the MEVE conservation areas have been finalized and there are chapter resolutions approving them. (pg. 71 reference to Biological preserves for Mesa Verde Cactus)	Not substantive. We will make note in the change in status of the plan where it is reference on pg. 71.	On page. 23 Changed citation to the MEVE conservation plan from <i>In Review</i> to 2021.

Comment Theme: Section 106 Consultation

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
55	11/20/2021	Question asked at Public Hearing meeting	Carl Etsitty	One thing I wanted to ask is that I don't see as a lot of elders and people who practices subsistence living, they know and understand the land and they live and work on the land for years and years. Any consultation with them is not written in there and that should be one of the consultations. There are Hataalii Association and there are a lot of non-profit organizations you included, and I'm just surprised that none of those non-SMEs, especially the non-subsistence practitioners are not consulted at all or something you should consider as a cooperating agency.	Not substantive. Refer to Questions #10 and #17.	No edits made.

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
56	11/20/2021	Question asked at Public Hearing meeting	Carl Etsitty	Is there an accountability process when consultation [Section 106] is done, in this case with the Navajo Nation, that it's done with the impacted citizens on the Navajo Nation? I'm speaking on behalf of the Tse lajin community and I know we have never been consulted and this is a process that is being done with Public Hearings and I know the burden always gets thrown back that it's your responsibility and I don't think that's an adequate response. As meaningful consultation, what does that mean to you and is it blaming the citizens?	Not substantive. The BIA held 11 public scoping meeting between February 5 to March 15, 2013 for this project. These were announced through radio and print advertisements as outlined in the Scoping Report (Appendix D). Additionally, the BIA opened an additional public comment period on April 29, 2021 for 30-days to receive any updated comments or concerns from the public. This was announced on the BIA's website and social media accounts, as noted in Appendix D. For individual projects, the BIA will engage with local community members. Refer to Questions #10 and #17 for more information on community engagement for projects and the Section 106 requirements related to involvement of cultural practitioners for weed management projects.	No edits made.
57	12/14/2021	Document Comments	Nora Talkington	There are several native thistle species (referring to list of culturally significant plants that may overlap with the weed plan on page. 41)	Not substantive. Sentence in the PEIS on page 41 denotes overlap between existing cultural plant lists and the noxious weed list. One of the prominent cultural plant lists (Wyman and Harris 1941) lists thistle only by genus. It is understood that there are native <i>Cirsium</i> thistles, such as the Navajo-listed Rydberg's thistle (<i>Cirsium rydbergii</i>), which is also noted in the Native Species Related to Candidate Noxious Weed Species in Appendix L. The species is noted here to indicate that there may be instances where non-native thistles may have been used for traditional practices.	No edits made.

Comment Theme: NNIWMP Distribution List

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits made
58	11/17/2021	Email Comment	Hugo Hoffman	Hugo requested to be added to the NNIWMP Distribution List. Contact information: Hugo Hoffman (he/him) NEPA Reviewer Environmental Review Branch Tribal, Intergovernmental & Policy Division U.S. Environmental Protection Agency, Region 9 (415) 972-3929 hoffman.hugo@epa.gov	Not substantive. Mr. Hoffman's name has been added to the project distribution list so he can receive updates and notifications regarding this project.	No edits made.

Comment Theme: Legal Authority

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits made
59	11/29/2021	Letter	Allen Nockideneh	Invasive species and noxious weeds are my biggest concern on the largest Indian Reservation in U.S. Indian country. We have no written policy or regulation in Navajo Nation Codes, Title III to prevent from bringing noxious weeds onto our reservation from other states or foreign countries. My utmost criticism is our tribal leaders were not present at the public hearings all week. I don't have patience any more to see livestock animals grazing and free roaming animals everywhere in each district spreading seeds. I've observed the hay vendors from other states, other semi-trucks with loads of alfalfa hay brought onto the reservation selling hay to Navajo producers throughout the reservation and spreading seed along State/BIA routes.	Not substantive. The BIA supports the adoption of a weed-free policy. The IWMP contains many recommendations in support for the use of certified weed-free plant and materials for projects as part of its prevention measures. See Sections 4.0 and 9.1 of the IWMP in Appendix A. The BIA recommends contacting local Navajo Nation Council representatives to support similar resolutions.	No edits made.

Comment Theme: Community Development Areas

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
60	12/14/2021	Email/Letter	Nora Talkington, NNDFW	Actually, this is incorrect. CDA areas are updated periodically internally by NNDFW staff along with all the RCP layers, which is then approved by the NN Resource Development Committee (RDC). NNHP uses sat photos of where development is being concentrated in community areas as well as data for NESL and big game wildlife species occurrences and knowledge of potential NESL and wildlife habitat to develop these layers.	Not substantive. The BIA will update the sentence on CDA development based on NNDFW's input.	Original Sentence: Planning for CDAs is done through the Navajo Nation Department of Community Development with the local Navajo Chapters and input from the BIA. New Sentence: <i>The CDAs are updated periodically by the Navajo Nation Department of Fish and Wildlife based on satellite imagery, and data on tribally listed species and big game species habitat and occurrences. These updates are then approved by the Navajo Nation Resource Development Committee.</i>

Comment Theme: Priority Weed Species

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
61	12/14/2021	Email/Letter	Nora Talkington, NNDFW	There is a ton of <i>Schismus barbatus</i> on Western Navajo in the Marble Canyon area. Are there any studies about the palatability of <i>Schismus</i> to wildlife? Just curious. (pg. 44, section 3.6.1)	Not substantive. Phillips et al. 1996 determined <i>Schismus barbatus</i> to have moderate palatability. Other weed species are also described in the paper. However, targeted grazing is not currently noted as a control method for the species. This paper is not cited as targeted grazing is noted as not being an effective control measure for <i>Schismus barbatus</i> (IWMP pg. A-41).	No edits made

No.	Date	Type of Comment	Commenter Name	Comment	BIA Response	Edits Made
62	12/14/2021	Email/Letter	Nora Talkington, NNDFW	However, some invasive species such as bull and musk thistles are important nectar sources for native and endangered pollinators. For example, NNHP has observed great basin silverspot butterflies utilizing invasive thistles for nectar forage, which are sometimes the only source available, since they are unpalatable to livestock. Land managers should replace invasive nectar sources with native ones as part of their BMPs for restoring pollinator habitat (pg. 45 before Sec. 3.6.2)	Not substantive. The BIA will note in the analysis on pg. 45 the importance of restoring native plants to support existing pollinator species for both generalized and specialists.	Section 3.6.1 added to the Pollinators sections: <i>These impacts underscore the importance of restoring native plant communities while reducing cover of problematic weeds and vegetation.</i> Section 4.5.1.2 added to the Cultural, Manual, and Mechanical Control section: Native plant revegetation in treated areas, particularly in riparian areas, <i>where pollinators are common, along roadsides, and on cut banks or slopes,</i> would be important to stabilize soils and improve wildlife habitat.
63	12/14/2021	Email/Letter	Jay Begay	Resolution from Hardrock Chapter for BIA to include cocklebur and silverleaf nightshade as a priority species in the IWMP.	Not substantive. While recognizing the impacts of these species to rangelands, both species are native plants and would not be eligible for treatment under the BIA Noxious Weed Program. The BIA recommends addressing these weeds as part of the ARMP for the Navajo Nation and/or in individual range management plans.	No edits made