

DECISION NOTICE
and
FINDING OF NO SIGNIFICANT IMPACT
for the
NON-NATIVE INVASIVE SPECIES TREATMENT PROJECT

USDA Forest Service
Blue Ridge Ranger District, Conasauga Ranger District
Chattahoochee National Forest

Catoosa, Chattooga, Dawson, Floyd, Fannin, Gordon, Gilmer, Lumpkin,
Murray, Towns, Union, Walker, and Whitfield Counties, Georgia

1. INTRODUCTION

On May 2, 2008, a proposal to treat non-native invasive species (NNIS) on the Blue Ridge and Conasauga Ranger Districts was sent out to both districts' mailing lists of interested individuals and groups. Treatment methods which could be used to control NNIS included manual, mechanical, cultural, and chemical treatments.

Based on comments from the public, internal interdisciplinary team members, and other interagency cooperators, an Environmental Assessment (EA) was prepared which described the proposed action and the No Action alternative and the potential effects associated with each alternative. Comments on the draft EA were solicited from the individuals and groups which responded to the scoping notice. Their input was used to help the deciding officials arrive at a final decision.

2. DECISION AND RATIONALE FOR THE DECISION

Purpose and Need

This proposal was developed to address one of the biggest biological threats to our National Forests – native species biodiversity and habitat loss due to NNIS. The purpose of this multi-year activity is to reduce or eliminate impacts from NNIS populations in order to protect the integrity of natural plant communities. Several forest health and native ecosystem restoration goals and objectives outlined in the revised Land and Resource Management Plan (LMP) for the Chattahoochee-Oconee National Forest (2004) will be met as a result of this proposal. The proposed action will:

- Minimize adverse effects of invasive native and non-native species. Control such species where feasible and necessary to protect national forest resources.
- Contribute to the viability of native and other desirable wildlife species.
- Enhance, restore, manage, and create habitats as required for wildlife and plant communities.

The Environmental Assessment (EA) documents the ability of the proposed action and the No Action alternative to meet these goals and objectives.

Decision

We have reviewed both of the alternatives and have decided to implement **Alternative 2, the Proposed Action**. This decision will move the area towards the desired conditions identified in the Forest Plan by minimizing adverse effects of invasive native and non-native species, contributing to the viability of native and other desirable wildlife species, and enhancing, restoring, managing, or creating habitats for native plants and animals.

The proposed action will implement manual, mechanical, cultural, and chemical methods to control or eradicate NNIS, utilizing an adaptive management approach. The use of an adaptive management strategy allows the Forest Service to anticipate changes in the species (i.e. infestations of new species) and the best methods for their control (i.e. new chemicals) as they change and evolve. An implementation checklist ensuring all resources have been considered will be required for each site (Appendix B). See Appendix A for a detailed description of the proposed action.

Other Alternatives Considered

In addition to the selected alternative, we considered one other alternative for implementation. A comparison of the alternatives can be found in Chapter 2 of the EA. We also considered the alternative that was not given detailed study in the EA.

Alternative 1- No Action

Under this alternative, non-native invasive plant populations would persist and continue to spread to adjacent areas. Existing trends across the landscape would be expected to continue. Ongoing Forest Service permitted and approved activities would continue; for example, road maintenance, fire suppression, hunting, fishing, and camping would continue to occur within the project area.

We eliminated the No Action Alternative from consideration because it would not move towards meeting the purpose and need for the project. Adverse effects of NNIS would not be minimized, viability of native species would not be protected, and native habitats would not be restored.

Alternatives Eliminated from Detailed Study

We considered an additional alternative that would treat NNIS without the use of herbicides. NNIS would be treated through the use of fire, hand control, or mechanical controls only. This alternative was eliminated from detailed study due to the inherent biological characteristics which render NNIS difficult to control with cultural or mechanical treatments alone. Many exhibit rapid growth rates, lack natural controls, are very good competitors, and produce abundant and early seed. Most NNIS plants are

perennials, with extensive tough runners or roots which readily resprout after cutting. Mechanical and cultural treatments do not control the roots. Prescribed fire often results in rapid re-growth and colonization of some NNIS species. Based on this, it would be impractical to rely only on cultural and mechanical means of control of NNIS. Therefore, we eliminated this alternative from consideration.

3. PUBLIC AND AGENCY INVOLVEMENT

Staff on the districts gathered known locations of invasive species infestations in 2007 and early 2008. On February 4, 2008, a pre-scoping meeting was held to gather internal input. Attendees included Cindy Wentworth (Forest Botanist/Ecologist), Jim Wentworth (Wildlife Biologist, Blue Ridge RD), Ruth Stokes (Wildlife Biologist, Conasauga RD), and Rachelle Powell (Wildlife Biologist Trainee, Blue Ridge RD). A public involvement (scoping) letter was composed and sent out to individuals, groups, and other agencies on May 2, 2008. This letter was sent out to 176 entities (see project file). Nine responses were received during this scoping period, and are in the project file.

Each response from scoping was reviewed in order to identify issues. Issues that would drive the development of an alternative are referred to as significant issues. No significant issues were identified for this project. The results of this process are displayed in Appendix 1 of the Environmental Assessment (EA).

A draft EA was released to interested publics for a 30-day comment period on October 3, 2008. A Request for Comments public notice was posted in *The Daily Citizen* (Dalton) on October 8, 2008, in *The News Observer* (Blue Ridge) on October 14, 2008, and in *The North Georgia News* on October 8, 2008. The EA was posted on the Forest Service website at www.fs.fed.us/conf. Four written responses and one telephone response were received during the comment period. All responses were supportive of the project, and/or included non-substantive comments. A summary of the responses is given below:

1. **Kenneth Estes, Georgia Appalachian Trail Club.** Supports proposal.
2. **Roger Tippens.** Supports proposal.
3. **Adam Hammond, Georgia DNR, Region 1, Game Management.** Supports proposal. Feels that the use of an implementation checklist for individual treatment areas is overly burdensome, and that treatment should focus on parts of the National Forest “where management options exist”, such as MP 9.H, 8.E.3, etc.
4. **Scott Frazier, Georgia DNR, Region 2, Game Management.** Supports proposal. Feels the maximum treatment acreage per annum (530 acres) is arbitrary and insufficient. Feels that prioritization of infestations to treat based on Management Prescription is unnecessary. Feels the 100 foot buffer for aquatic applications is unnecessary (50 feet would suffice).
5. **Darren Wolfgang and Wayne Jenkins, Georgia ForestWatch.** Supports proposal. Suggested methods of signage for treatment areas. Suggested treatment areas and techniques. Concerned about oversight of implementation (i.e. contractors) and monitoring and record-keeping.

4. FINDING OF NO SIGNIFICANT IMPACT

After considering the environmental effects described in the Environmental Assessment, we have determined that the actions associated with Alternative 2 (Proposed Action) will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27).

Thus, an environmental impact statement will not be prepared. We base our finding on the following:

1. Both beneficial and adverse effects have been considered. Impacts associated with the project are discussed in Chapter 3 of the EA. These impacts are within the range of those identified in the Forest Plan. Our finding of no significant environmental effects is not biased by the beneficial effects of the action.
2. The selected alternative will not result in significant effects on public health and safety, and implementation will be in accordance with project design features (EA, Chapter 2).
3. There will be no significant effects on unique characteristics of the geographic area such as park lands, historical and cultural resources, prime farmlands, wetlands, floodplains, wild and scenic rivers, or ecologically critical areas. (EA, Chapter 3).
4. The effects on the quality of the human environment are not likely to be highly controversial because there is no known scientific controversy over the impacts of the project.
5. We have considerable experience with the types of activities to be implemented. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk (EA Chapter 3).
6. The action is not likely to establish a precedent for future actions with significant effects, because they do not represent a decision in principle about future proposals.
7. The cumulative impacts are not significant. The EA includes all connected, cumulative, and similar actions in the scope of the analysis. The cumulative effects of past, present and reasonably foreseeable actions are considered and disclosed in the EA, Chapter 3.
8. The proposed action includes use of an implementation checklist which requires archaeological clearance prior to implementation. Heritage resources will be

protected through avoidance as needed. The action will have no significant adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, and will also not cause loss or destruction of significant scientific, cultural, or historical resources. (EA, Chapter 3).

9. Implementing this decision will not adversely affect threatened or endangered species, or result in the loss of any other species' viability, or create significant trends toward federal listing of the species under the Endangered Species Act (EA Chapter 3 and Biological Evaluation).
10. The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA. The action is consistent with the Chattahoochee-Oconee National Forests Land and Resource Management Plan (EA, Chapter 1).

5. FINDINGS REQUIRED BY LAWS AND REGULATIONS

This project is consistent with the Forest Plan for the Chattahoochee-Oconee National Forest as required by the National Forest Management Act (NFMA) 1976, 16 USC 1604(1). It is consistent with the Forest Goals and Objective listed in the purpose and need for the project. The project was designed to conform to land and resource management plan standards and incorporates them in the implementation.

6. ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES

This decision is not subject to appeal pursuant to 36 CFR 215.12(e)(1). Notice of the proposed action was published. An opportunity to comment on the EA was provided. All commentors were supportive of the proposal, and/or provided non-substantive comments.

7. CONTACT INFORMATION

For further information on this decision contact Ruth Stokes, Wildlife Biologist, Conasauga Ranger District, 3941 Highway 76, Chatsworth, GA 30705; phone (706) 695-6736. For information on the Forest Service planning process as it relates to this decision, contact John Petrick, Forest Planner, at 770-297-3005.

8. IMPLEMENTATION

Implementation may begin immediately after publication of a legal notice in *The Daily Citizen*, *The News Observer*, and *The North Georgia News*.

9. RESPONSIBLE OFFICIALS

/s/ Alan Polk

January 8, 2009

ALAN POLK

Date

Blue Ridge District Ranger

/s/ Michelle H. Jones

January 8, 2009

MICHELE H. JONES

Date

Conasauga District Ranger

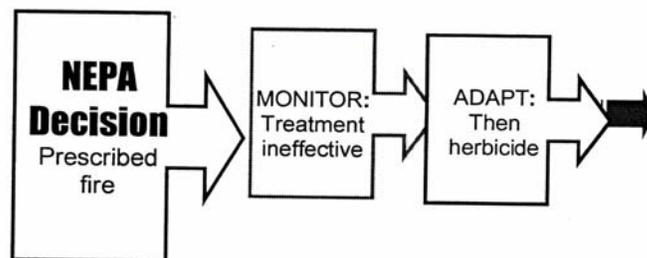
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APPENDIX A

Detailed Description of the Proposed Action

The proposed action would implement an adaptive management approach to control and eradicate NNIS. The use of an adaptive management strategy (Figure 1) would allow the Forest Service to anticipate changes in the species (i.e. infestations of new species) and the best methods for their control (i.e. new chemicals) as they change and evolve. This alternative recognizes that NNIS infestations constantly change and evolve, making it difficult to keep treatments current. It is certain that not all infestations can and will be mapped and limiting treatment to known locations and species of NNIS does not allow for changes over time. Significant time would be necessary to complete analysis of additional populations and species. These species would expand during this waiting period, and the opportunity of containing these populations would be lost.

Figure 1. Adaptive Management Example



The NNIS that would be treated using this adaptive management approach are found in the following table:

Table 1: Current Forest NNIS List

Scientific Name	Common Name
Ailanthus altissima	Tree of heaven
Albizia julibrissin	Mimosa; Silktree
Arctium minus	Common burdock
Carduus nutans	Musk thistle; Nodding plumeless thistle
Celastrus orbiculatus	Oriental bittersweet
Cirsium vulgare	Bull thistle
Dioscorea oppositifolia	Chinese yam
Elaeagnus umbellata	Autumn olive
Hedera helix	English ivy

Lespedeza cuneata	Sericea lespedeza
Ligustrum sinense	Chinese privet
Lolium arundinaceum *	Tall fescue
Lonicera japonica	Japanese honeysuckle
Melia azedarach	Chinaberry
Microstegium vimineum	Japanese stiltgrass; Nepal grass
Miscanthus sinensis	Chinese silvergrass
Paulownia tomentosa	Princess tree
Polygonum cuspidatum	Japanese knotweed
Pueraria lobata	Kudzu
Rosa multiflora	Multiflora rose
Spiraea japonica	Japanese spirea; Japanese meadowsweet
Sorghum halepense	Johnson grass
Vinca minor	Small periwinkle
Wisteria sinense	Chinese wisteria

* - applies only to endophyte-enhanced cultivars, (e.g. KY 31 tall fescue)

Infestations of several of the NNIS in Table 1 have been documented on both the CRD and BRRD. Sites currently known that need treatment are listed in Table 2:

Table 2. Known NNIS Sites

Ranger District	Site	Species	Acreage
Blue Ridge	Starr Creek Road-Richard Knob	Kudzu	1.0
Blue Ridge	Lake Chatuge	Kudzu	2.0
Blue Ridge	Hwy 180 near Sosebee Cove	Kudzu	3.0
Blue Ridge	Forest Drive – Lake Nottley	Kudzu	2.0
Blue Ridge	West Skeenah Road	Oriental bittersweet	0.25
Blue Ridge	Appalachian Trail – Woody Gap	Oriental bittersweet	0.25
Blue Ridge	Sea Creek Falls trailhead	Chinese privet	0.5
Conasauga	Watson Gap	Japanese knotweed	0.25
Conasauga	Gates Chapel	Japanese knotweed	0.25
Conasauga	Mountaintown Creek	Chinese privet	0.25
Conasauga	Hurricane Creek	Chinese privet	1.0
Conasauga	Alaculsy Valley	Kudzu	0.5
Conasauga	Dyer Gap	Kudzu	0.5
Conasauga	West Cowpen Road	Kudzu	1.0
Conasauga	East Cowpen Road	Kudzu	1.0

In addition to the above list of sites that was in the project scoping letter, new sites of NNIS have been documented. In the summer of 2008, NNIS inventories were conducted in several Wilderness areas and along firelines constructed for wildfires that occurred in 2007. The predominant NNIS found in all areas was Nepal grass. Additional species found were multiflora rose, exotic lespedezas, princess tree, autumn olive, mimosa, burdock, honeysuckle, kudzu, tall fescue, privet, Japanese spirea, and musk thistle. Most of these NNIS were associated with old road beds and trails.

All NNIS populations are a concern across the Districts, but a priority system is needed to ensure that the NNIS populations that pose the greatest threat to biodiversity and native plant communities are highlighted. The priority for treatment would be based on the impact to the biodiversity in the area combined with a priority for the rapid response to new species detected on the two ranger districts. In addition, the location of the infestation would be prioritized.

- NNIS infestations which threaten federally listed, Regional Forester's sensitive, or locally rare species (see Forest Plan, p 2-13, FW-032)
- NNIS infestations of species that are early in their colonization of the Districts and are considered highly aggressive in spread and impacts to native plants. These species are considered to have a high I-rank. For example, Japanese knotweed is highly aggressive and only known on 2 locations across the Forest. These populations would be a high priority for treatment.
- NNIS infestations which are within or adjacent the following Management Prescriptions (MP) will receive higher priority than other areas:
 - Rare communities (MP 9.F)
 - Botanical Areas (MP 4.D)
 - Designated Wilderness Areas (MP 1.A)
 - Recommended Wilderness Study Areas (MP 1.B)
 - Appalachian Trail (AT) corridor (MP 4.A)
 - Natural Areas (MP 4.I)
- NNIS infestations in areas that serve as vectors for spread into areas without infestations and areas where new populations are likely to establish. These include areas such as riparian corridors, roadsides, trails, wildlife openings, campgrounds, boat docks, administrative building, utility corridors, and parking areas.

Any NNIS control proposal in Wilderness will be reviewed through the Minimum Requirement Decision Guide (MRDG) <http://www.wilderness.net/mrdg/> to determine if the proposed actions are necessary for the Wilderness Area, or if a less intrusive method could be implemented. Depending on the method of NNIS control proposed, final approval of the action will come from the Forest Supervisor or from the Regional Forester.

Due to the broad scale of the proposed action and its adaptive nature, additional site-specificity would be ensured through the use of an implementation checklist (Appendix B). Prior to any treatments, management actions would be subject to additional site-

specific review by Forest staff in the areas of botany/ecology, wildlife biology, aquatic biology, hydrology/soils, heritage resources and the wilderness manager (if appropriate). The use of the implementation checklist would ensure that potential environmental impacts are within the scope of the impacts predicted in this EA.

To analyze the potential environmental effects of the proposed action, a maximum annual treatment acreage of National Forest land was estimated considering the known levels of NNIS infestations including location and species, and current and anticipated funding levels. The maximums are as follows: (see Methods section below for a description of the various treatments)

- Up to 150 acres of manual or mechanical treatments
- Up to 30 acres of spot treatments using cultural methods
- Up to 350 acres of herbicide treatments

Methods

Proposed Manual and Mechanical Methods: Hand-pulling, cutting, digging, mowing, or plowing would be the principal manual methods employed. Manual methods are primarily effective for controlling small spot infestations. Examples of hand tools that might be used include shovels, saws, axes, loppers, hoes, or weed-wrenches. Other equipment could include chain saws, brush blades, mowers, and small bulldozers.

Proposed Cultural Methods: Cultural methods may include the use of fire, mulch, or other gardening techniques such as weed cloths and plastic sheeting, or propane weed torch to spot-burn specific invasive plants. The weed torch works to burn a single target plant, and is primarily used in plant communities such as bogs or areas with low potential to carry a fire. Other use of prescribed fire would be applied in accordance with approved burn plans.

Proposed Chemical (Herbicide) Methods: All LMP Forest-wide standards (FW-011 through FW-028) for herbicide use will be followed. Herbicides would be used according to manufacturer's label direction for rates, concentrations, exposure times, and application methods. Herbicides would be directly applied to the target plants. Techniques that could be used include direct foliar applications using systems mounted on trucks, tractors or all-terrain vehicles, backpack sprayers, hand-held brushes, basal bark and stem treatments using spraying or painting (wiping) methods, cut surface treatments (spraying or wiping), and woody stem injections. No herbicides would be applied aerially. Only formulations approved for aquatic-use would be applied in or within 100' of wetlands, lakes, and streams.

Specific herbicides that could be used in the project area are listed below. Detailed descriptions of these chemicals including comprehensive risk assessments for each can be found at: <http://www.fs.fed.us/foresthealth/pesticide/risk.shtml>

- **Glyphosate** (Accord™, Roundup™, and Rodeo™) is a non-selective, broad spectrum herbicide that can be used to control many grasses, forbs, vines, shrubs, and tree species. Specific formulations of glyphosate have been labeled for aquatic application.
- **Triclopyr** (Garlon 3A™, Garlon 4™, and Pathfinder II™) is a selective herbicide that controls many species of herbaceous and woody broadleaf weeds, but has little to no effect on grasses.
- **Clopyralid** (Transline™) is a selective herbicide that controls broadleaf herbs, primarily composites, legumes, and smartweeds.
- **Imazapic** (Plateau™) is a selective herbicide that is used primarily in and around populations of native, warm season grasses.
- **Imazapyr** (Arsenal™ and Chopper™) is a selective herbicide that is used primarily in the control of hardwood trees and some species of grasses.
- **Sethoxydim** (Poast™) is a selective post-emergence herbicide used to control annual and perennial grasses.

APPENDIX B
Implementation Checklist

NRIS Site ID: _____ Species name: _____

Lat/Long in decimal degrees: N _____ W - _____

GIS Acres: _____ (*calculated from GIS*) % of Site Infested: _____

List other NNIS species present at site:

Treatment method (List methods, chemicals used, date to be treated, by whom, etc)

Designated Wilderness or Recommended Wilderness Study Area? (Y/N)

If yes, coordinate with District Wilderness Manager. This will require analyzing the proposed control method through the Wilderness Minimum Requirement Decision Guide (MRDG) and documenting in the project file. Final approval will be by the Forest Supervisor or Regional Forester, depending on control method chosen

Botanist Review: (Describe any special circumstances including the presence of TES species and rare or unique communities. List all recommended mitigations below.)

Wildlife Biologist Review: (Describe any special circumstances including potential impacts to forage and wildlife investments. List all recommended mitigations below.)

Aquatic Biologist Review (only required when treating sites within riparian area):

(Describe any special circumstances including the presence of aquatic TES species. List all recommended mitigations below.)

Hydrologist/Soils Review: (Describe any special circumstances regarding potential impacts to water quality. List all recommended mitigations below.)

Archaeologist Review (only required if treatment involves ground disturbance):

(Describe any special circumstances regarding historical or cultural significance. List all recommended mitigations below.)

Signatures:

Botanist/Ecologist

Wildlife Biologist

Aquatic Biologist

Hydrologist

Archaeologist

Wilderness Mgr.(if needed)