



United States  
Department of  
Agriculture

Forest  
Service

Midewin National Tallgrass  
Prairie

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**File Code:** 1950-1

**Date:** October 31, 2001

**Route To:**

**Subject:** Herbicide Use for Invasive Plant Species and Noxious Weeds Control

**To:** Public Scoping List

Dear Friends and Partners of Midewin:

The Forest Service at Midewin National Tallgrass Prairie (Midewin) is proposing to control invasive plant species and noxious weeds through limited use of herbicides within Midewin in order to help in the restoration of tallgrass prairie habitat. During this initial public comment period, we are providing you with information on the proposed use of herbicides and invite you to send us your comments.

Direction in Executive Order 13112 and the National Invasive Species Management Plan provides the basis for our proposal to control invasive plant species and noxious weeds (exotic, non-native vegetation), which pose an increasing threat to native ecosystems. As directed by Forest Service policy (FSM 2080), Midewin is responsible for preventing, controlling, and eradicating noxious weeds on lands under its jurisdiction. Noxious weeds are defined by the Forest Service as aggressive and difficult-to-manage, non-indigenous plant species. The Federal Noxious Weed Act of 1974 requires Forest Service cooperation with State, local, and other Federal agencies in the application and enforcement of all laws and regulations relating to management and control of noxious weeds. Additionally, Illinois law requires control of certain plant species declared to be noxious weeds by the State of Illinois (IL Noxious Weed Law). The Illinois Exotic Weed Act further defines exotic (non-native) weeds as plants that “spread vegetatively or naturalize and degrade natural communities, reduce the value of fish and wildlife habitat, or threaten an Illinois endangered or threatened species.”

The specific objective we propose to accomplish is to control invasive plant species and noxious weeds by means of limited herbicide use. Herbicides would be used in concert with other methods, including seeding, cultivation, hand-pulling, mowing, cutting, and burning as part of Midewin’s Integrated Pest Management (IPM) strategy. The Purpose and Need, or rationale, for controlling invasive species with herbicides is to facilitate restoration of the tallgrass prairie ecosystem at Midewin. Invasive species reduce the effectiveness of ecosystem restoration by competing with desired species for light, nutrients, and water. They change habitat structure, contaminate native seed production, and alter hydrologic regimes in certain wetlands.

We do not expect to treat more than 500 acres with herbicides on an annual basis at Midewin. Within the sites listed below, only small areas will actually be treated. In no case will entire tracts be treated with herbicides. We have identified the following sites, **within which the selected smaller areas will be treated**, for herbicide treatment to control invasive species and noxious weeds:



1. **Drummond Dolomite Prairie Area** (580 acres);
2. **Grant Creek Prairie Annex Area** (240 acres);
3. **Doyle Creek Wetlands** (410 acres);
4. **Seed Production Areas** (260 acres);
5. **Foxglove Prairie** (50 acres);
6. **Blodgett Road** (290 acres);
7. **South Patrol Road** (420 acres);
8. **Prairie Creek Woods** (230 acres);
9. **Pastures and other agricultural grasslands** (5,520 acres);
10. **Spot treatment areas for new invasives** (3,780 acres).

These areas are indicated on the enclosed map. Midewin lands currently leased for agricultural use or grazing (3,950 acres) have not been included in areas designated for herbicide use. They may be included at a later time for spot treating new invasives (# 10) as agricultural uses are phased out.

Undesired invasive species and noxious weeds at the prescription sites listed above include Canada thistle, perennial sow thistle, wild parsnip, rhizomatous cool-season grasses, Amur honeysuckle, tall goldenrod, reed canary grass, common reed (*Phragmites australis*), sweet clover, autumn olive, white mulberry, Osage-orange, multiflora rose, common teasel, and certain native woody plants (e.g., green ash, red haw, sandbar willow, and eastern cottonwood). Not all species are considered threats at some sites; for example, rhizomatous cool-season grasses and scattered Osage-orange may be desired species in or near grasslands managed for certain bird species.

Additionally, we propose to attempt to eradicate or prevent the spread of other invasive plant species that have recently colonized Midewin, such as leafy spurge, spotted knapweed, crownvetch, cut-leaved teasel, blue globe thistle, and purple loosestrife. These species are restricted to a few localities, and effective measures are needed to prevent their rapid expansion throughout Midewin.

Several other invasive species common in surrounding environs are likely to appear on Midewin in the foreseeable future, and prompt actions will be needed to prevent their permanent establishment. Examples of such species include Oriental bittersweet, Japanese knotweed, glossy buckthorn, and *Sericea* bush clover. Spot treatments of herbicides will be applied to control or prevent small infestations of these invasive species as they become known.

None of the treated areas, either prescription areas (# 1-9 above) or spot treatment areas for new invasives (# 10), are expected to exceed one acre in size; most will be less than 1,000 square feet.

The following herbicides being considered are approved for use by the U.S. Environmental Protection Agency (EPA) and the Illinois EPA:

1. **2, 4-D** acetic acid - applied to foliage to control invasive broadleaf herbaceous plants and woody seedlings. Relatively selective; does not harm certain monocots (including grasses).
2. **Glyphosate** (Roundup®, Rodeo®) – applied to foliage for control of invasive herbaceous (including grasses) and woody plants; also used as a treatment on cut stumps to prevent re-sprouting. Because glyphosate is non-selective, application methods and seasonal timing will be used to prevent impacts on non-target species.
3. **Pelargonic Acid** (Scythe®) – applied to foliage to kill annual or biennial herbs; plants with perennial roots or stems usually recover.
4. **Sethoxydim** (Poast™) - applied to foliage for selective control of annual and perennial grasses.
5. **Triclopyr** (Garlon™) - applied to foliage for control of invasive, broadleaf herbaceous and woody plants; also used as a treatment on cut stumps to prevent re-sprouting, or as a basal bark application to kill woody plants.
6. **Clopyralid** (Transline™) - applied to foliage for selective control of herbaceous and woody plants belonging to certain taxonomic groups, including thistles, teasels, legumes, and knotweeds.

Based on the known invasive species of vegetation and noxious weeds in the project areas, we anticipate that issues and concerns will focus on herbicide safety, effects of control/eradication activities on animal and plant species, and effects on water quality. Safe and appropriate use of herbicides at selected sites will facilitate restoration of the tallgrass prairie ecosystem and improve our capabilities to manage land and water resources in order to conserve and enhance native populations of fish, wildlife, and plants in accordance with the Illinois Land and Conservation Act of 1996.

The Midewin Land and Resource Management Plan is in the final stages of development, and restoration objectives are contained in all action alternatives developed for the Plan. Standards and Guidelines in the Plan include the use of herbicides as one of the tools to restore tallgrass prairie habitat at Midewin. Long-term monitoring of the effects of invasive species control will be implemented in order to assure the success of actions taken to protect and improve the restored communities at Midewin for future generations.

With this letter, we are initiating the procedures required of the Forest Service by the National Environmental Policy Act (NEPA). We will complete an Environmental Assessment (EA) for the proposed activities during the next few months. You have been contacted as part of the public involvement process. Your comments on the proposed action will help complete the Environmental Assessment.

Please consider the following specific questions and respond to any or all of them in writing by no later than December 3, 2001.

1. Is there any information about the project area (Midewin) that you believe is important in the context of the proposed activities and which the Forest Service might have overlooked?

2. For you or the group you represent, what are the potential effects of this proposal that you are particularly concerned about?
3. Are there reasonable alternative ways to meet the Purpose and Need (the rationale for conducting activities) for which you would like the Forest Service to develop and analyze the environmental effects?
4. Are there environmental effects in addition to the ones listed above which you feel are important and would like to have addressed in the EA? If so, please include your rationale for why they should be analyzed.

We will review and consider comments received during this public input period. We will then develop and analyze alternatives to this proposal, and analyze other environmental effects. We will also analyze a “No Action” alternative as required by NEPA regulations. As the Prairie Supervisor, I will be the deciding official for this project.

At this time, I do not believe that the proposed activities will have a significant impact on the environment based on similar activities conducted in the past. However, we will analyze the proposed activities’ effects on the biological, cultural, and socio-economic environment, including water, air, soil, sensitive species, federally threatened and endangered species, and heritage resources in order to make a final determination.

You will have an opportunity to review and comment on the analysis we conduct when I release the Environmental Assessment. My final decision, issued after comments have been reviewed and addressed, will be administratively appealable under 36 CFR 215.

If you have any questions about the proposed activities or the Purpose and Need, please feel free to contact Enid Erickson, Midewin Environmental Coordinator, at the address above, by email at [eerickson@fs.fed.us](mailto:eerickson@fs.fed.us), or by phone at (815) 423-6370.

Please submit your written comments by December 3, 2001 to Enid Erickson at the address above. Thank you for your interest in activities at Midewin National Tallgrass Prairie.

*Frank Koenig*

FRANK KOENIG  
Prairie Supervisor, Midewin  
National Tallgrass Prairie