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Department of
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January 2007

White Mountain National Forest Forest-wide Invasive Plant Control Project

USDA Forest Service
White Mountain National Forest
Coos, Grafton, and Carroll Counties, New Hampshire
Oxford County, Maine



Decision Notice and Finding of No Significant Impact for the Environmental Assessment

Appendix D – Forest Service Response to 30-Day Comments



Prepared by: White Mountain National Forest

For Information Contact: Thomas Giles
Assistant District Ranger
Pemigewasset Ranger District
1171 Rte 175
Holderness, NH 03245
tjgiles@fs.fed.us
(603)536-1310
www.fs.fed.us/r9/white

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Contact the
White Mountain National Forest**

(603) 528-8721

TTY (603) 528-8722

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Decision Notice and Finding of No Significant Impact

January 2007

Responsible Agency

USDA Forest Service

Responsible Official

Barnie Gyant, Deputy Forest Supervisor
719 Main Street
Laconia, NH 03246
603 528-8710

Forest Supervisor

Thomas G. Wagner
White Mountain National Forest
719 Main Street
Laconia, NH 03246
603 528-8774

For further information contact

Thomas Giles, Assistant District Ranger
Pemigewasset Ranger District
1171 Route 175
Holderness, NH 03245
603-536-1310/1315

White Mountain National Forest

Carroll County, New Hampshire
Coos County, New Hampshire
Grafton County, New Hampshire
Oxford County, Maine

**White Mountain National Forest
Forest-wide Invasive Plant Control Project**

DECISION NOTICE and FINDING OF NO SIGNIFICANT IMPACT

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Appendix D

Comments on the WMNF Forest-wide Invasive Plant Control Project Environmental
Assessment and Forest Service

Responses.....D-1

**Decision Notice and
Finding of No Significant Impact
White Mountain National Forest Forest-wide Invasive
Plant Control Project**

1.0 Background

The analysis area for this project is the White Mountain National Forest comprising approximately 796,800 acres in northern New Hampshire, including Coos, Grafton and Carroll Counties, and western Maine including Oxford County.

Currently, there are in excess of 180 known sites of non-native invasive plant species (NNIS) on the Forest. Surveys have identified 24 species or complexes of non-native invasive plants on the Forest, with an additional 11 species that have the potential to develop infestations on the Forest. Sometimes referred to as “noxious weeds,” these plants have characteristics that permit them to rapidly invade and dominate in new areas, often out-competing other vegetation for light, moisture, and nutrients. The introduction and rapid spread of invasives can threaten native plant communities, which may include threatened, endangered, or sensitive plant species. Subsequently, these community changes can alter habitats, affecting animal communities as well.

Previous control measures on the Forest have generally been isolated, specific projects targeting single infestations or clusters of infestations. It became apparent these efforts were typically effective, however the amount of resources the Forest was using to assess the impacts of these projects on a site-by-site basis would not adequately address all of the existing infestations, and certainly would fail to address the establishment and spread of new infestations. It became obvious that a new and more comprehensive strategy would be necessary to address the NNIS plant threat before it overwhelmed the Forest. Consequently, I directed an environmental analysis to look at the Forest in a comprehensive fashion, and develop a treatment strategy that was responsive not only to existing infestations, but would also respond to new infestations as they developed over the next ten years, and to analyze the environmental impacts of the treatment strategy in a single environmental analysis.

2.0 Purpose of and Need for Action

2.1 Purpose of the Action

The purpose of this project is to protect and restore naturally-functioning native ecosystems on the Forest by controlling or managing NNIS plants. This project also seeks to accomplish several resource goals and objectives identified in the *White Mountain National Forest Land and Resource Management Plan* revised in September, 2005 (Forest Plan NNIS Goals, p. 1-6 and Forest Plan NNIS Objectives, p. 1-7)

2.2 Need for Change

The Need for Change was determined by comparing the existing condition in the analysis area to the desired future condition as described by the goals and objectives in the Forest Plan. This action is needed because existing populations of NNIS currently occur on the Forest and are degrading natural communities. Past projects to control invasive plants on the Forest have been analyzed on a site-by-site basis. Those projects included mechanical, biological, and chemical controls, all on an extremely limited basis. Due to the scope of the current invasive plant species problem, and in order to be able to treat future infestations more effectively, a broader and more comprehensive approach was developed.

In order to respond quickly to existing and emerging invasive plant threats, the Forest needed to adopt an approach that provides the decision maker with an analysis of both current and potentially new infestations. As a result of this analysis, we will be able to treat current and future infestations that fall within the scope of this analysis over a period of the next ten years.

3.0 Decision to be Made

3.1 Decision Points

The Decision Notice documents activities to be implemented to meet the project's Purpose and Need. The decision points considered in my selection of an alternative were:

1. Which of the alternatives would best move the Forest toward the goals and objectives outlined in the Forest Plan and best meet the Purpose and Need for action?
2. Which of the alternatives best addresses relevant issues raised by the public and the interdisciplinary team?
3. Would the proposed action and its alternatives pose any significant environmental impact to warrant the need for an environmental impact statement?
4. Do the mitigation measures for the proposed action and its alternatives meet the Forest Plan Standards and Guidelines?

3.2 Decision

I have decided to implement Alternative 2, the Proposed Action. I base my decision on the Environmental Assessment (EA), the direction provided by the Forest Plan (and the associated Final Environmental Impact Statement), the Finding of No Significant Impact (FONSI), and on input provided through the Public Involvement process. I believe this alternative was analyzed sufficiently to address the issue raised during the public scoping process, and it best meets the Purpose and Need for Change with the most efficient use of available resources. I have read the comments submitted during the 30-day Comment Period, and I appreciate the general support expressed by the public for this project. My rationale for selecting Alternative 2 is detailed in Sections 3.3 and 3.4 of this document.

Alternative 2 will allow the Forest to move forward in treating NNIS plant species using mechanical, chemical and biological treatment methods. The methods I am approving for use in this project are outlined in the following tables.

Mechanical methods will not include the use of heavy equipment, e.g. bulldozers, excavators, etc.

Mechanical Treatment Methods	
Method	Description of Action
<i>Pull</i>	Manually pull entire plant, including roots.
<i>Girdle</i>	Used on larger diameter woody stems and trees. Using a hatchet or similar tool, cut through the bark encircling the base of the tree, approximately six inches above the ground, making certain the cut goes well below the bark through the cambium layer. Effective at killing the top of the tree. Resprouts are common and may require a follow-up treatment with a foliar herbicide.
<i>Cut Stem</i>	Cut stem with hand or power tools (e.g. weed-whip or mower). Can be used alone or in combination with application of systemic herbicide.
<i>Root Stab</i>	Cut root below ground level.
<i>Suffocate</i>	Spread light-impervious material, such as black plastic, over the plant to starve it of light. Follow-up monitoring is necessary to evaluate success and eventually remove the light-impervious material.

Chemical treatment methods will be limited to the following set of herbicides.

Herbicides Considered for Use in Alternative 2			
Common Chemical Name	Some <i>Examples</i> of Brand Names	Targeted Use	Target Species - Examples
<i>triclopyr</i>	Brush-B-Gone [®] ; Garlon3A [®] ; Habitat [®] ; Vine-X [®] , Garlon 4 [®]	Cut stem and/or basal bark treatment; foliar spot spray. Broad-leaf selective.	Oriental bittersweet, swallowworts, buckthorns
<i>glyphosate</i>	Glialka [®] ; Glifonox [®] ; Glycel [®] ; Muster [®] ; Rondo [®] ; Roundup [®] ; Sting [®] ; Spasor [®] ; Sonic [®] ; Tumbleweed [®]	Cut stem and/or basal bark treatment; foliar spray. Non-selective.	honeysuckle, barberry, Norway maple, burning bush, autumn olive, garlic mustard, buckthorns

Herbicides Considered for Use in Alternative 2			
Common Chemical Name	<i>Some Examples of Brand Names</i>	<i>Targeted Use</i>	<i>Target Species - Examples</i>
<i>glyphosate – aquatic formulation</i>	Rodeo [®] ; Glyphos Aquatic [®] ; Pondmaster [®] ; Accord [®] ; Eagre [®]	Cut stem; wand or glove application near open water. Non-selective.	Purple loosestrife, yellow-flag iris, common reed, knotweeds, buckthorns
<i>clopyralid</i>	Confront [®]	Foliar spray on composites and legumes. Broad-leaf selective.	Thistles, knapweeds

Biological methods will be limited to the following bio-control insects used to control infestations of purple loosestrife.

Table 2.3. Biological Control Insects Proposed		
Bio-Control Insect	Scientific Name	Method of Impact
<i>Black-margined loosestrife beetle</i>	<i>Galerucella californiensis</i>	Leaf eater
<i>Golden loosestrife beetle</i>	<i>Galerucella pusilla</i>	Leaf eater
<i>Loosestrife root weevil</i>	<i>Hylobius transversovittatus</i>	Root borer

3.3 Reasons for Decision

I have carefully considered the various treatment methods prescribed in each of the alternatives and have concluded that Alternative 2 provides the most effective strategy to treat both existing and future NNIS plant infestations on the Forest. Under this alternative, the analysis has concluded that most infestations will be eliminated or under control, while some species, due to their pervasiveness, may persist. By implementing this strategy, we would expect there to be a substantial reduction in the number of current and future NNIS sites on the Forest. The significant advantage of Alternative 2 is that by including herbicides as a treatment option, the Forest will be in a position to much more efficiently and effectively treat the number and type of infestations present on the Forest, both current and future. Due to the relatively early stages of NNIS infestation on the Forest, it is important that we apply our limited resources to treat these infestations as quickly and efficiently as possible.

I have carefully considered the safety considerations with incorporating herbicides as a treatment option in Alternative 2. The best available science and research has concluded that when used properly, the herbicides permitted for use in this project can be applied safely and will not harm humans or the environment.

3.4 Other Alternatives Considered but not Selected

In addition to the selected alternative, I considered two additional alternatives. For a detailed comparison of these alternatives see Comparison of Alternatives (Section 2.5) in the Environmental Assessment.

Alternative 1: No Action

Under the No Action alternative, no new projects to control NNIS plants would be initiated and current infestations would continue to grow in size and provide a source for other infestations.

I did not select this alternative because it does not meet the Purpose and Need for Change, nor does it achieve Forest Plan goals and objectives for NNIS plants. This Alternative would continue to fall short of meeting the need to effectively treat NNIS infestations, both currently and in the future. Under this Alternative, NNIS plants would be present in ever increasing numbers and spread to currently un-infested, less disturbed and higher quality habitat. The resulting decrease in ecological function across the Forest would be unacceptable.

Alternative 3: Mechanical and Biological Treatments

This Alternative is the same as Alternative 2 with the exception of not using chemical treatment methods.

I did not select this alternative because: it is the least responsive of the Action Alternatives to the Purpose and Need for effectively treating current and future NNIS infestations. This Alternative relies primarily on manual treatment methods (with the possible exception of using beetles to treat purple loosestrife) to treat current and future infestations. When I considered the possibility of having to mechanically treat the number of known and potential future infestations across the Forest, it became apparent that the Forest would not have sufficient resources in terms of manpower, either internal or contracted, to effectively treat these infestations. However, given the current number and size of the current infestations, it is unreasonable to assume we would be able to devote the resources necessary to effectively treat these infestations by relying primarily on mechanical methods.

4.0 Public Involvement

A scoping letter soliciting comments on the White Mountain National Forest Forest-wide Invasive Plant Control Project proposal was sent to 1,786 people including adjacent property owners, local and state governments, and various agencies and organizations dated April 13, 2006. The project was also listed in the Quarterly Schedule of Proposed Actions for the White Mountain National Forest. A notice announcing the proposed project was printed in the New Hampshire Union Leader and Lewiston Sun Journal on April 28, 2006. The scoping letter was also posted on the White Mountain National Forest web page (www.fs.fed.us/r9/white).

The 30-day Comment Period for the White Mountain National Forest Forest-wide Invasive Plant Control Project was initiated with legal announcements in the New Hampshire Union Leader and the Lewiston Sun Journal on November 2, 2006. The EA was mailed to 19 individuals who responded to the scoping report or had requested it. In addition, the EA was posted on the White Mountain National Forest web page (www.fs.fed.us/r9/white). During this period, we received six responses. I have considered these comments in making my decision, and have included my response to all comments in Appendix D of this document.

4.1 Issues Used to Formulate Alternatives

Potential issues considered during the analysis were raised by the public, Forest Service employees, and the interdisciplinary (ID) team during the scoping process. The main issue of concern used to develop alternatives was:

Issue: The Forest should not use herbicides.

In response to this issue, an additional alternative was developed and analyzed – Alternative 3, which would only use mechanical and biological control methods. The effectiveness of this alternative in achieving the NNIS goals and objectives in the Forest Plan was described in the effects analysis in the Environmental Assessment and was a determining factor in my decision not to implement Alternative 3.

5.0 Finding of No Significant Impact

After considering the environmental effects described in the EA, I have determined that these actions 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. I base my finding on the following:

Both Beneficial and Adverse Impacts have been Considered

Both beneficial and adverse impacts of implementing Alternative 2 have been considered in the EA (Chapter 4). My finding of no significant environmental effects is not biased by the beneficial effects of the action. Though the effects from Alternative 2 may be both beneficial and adverse to certain resources, the EA demonstrated that these effects are relatively minor and the impacts generated are not directly, indirectly or cumulatively significant.

Effects to Public Health and Safety

There will be no significant effects to public health and safety because mitigation measures are in place to minimize potential negative effects to humans and the environment. Similar activities have been implemented in the past and the described mitigation measures have proven to be effective. Concerns expressed by the public about the use of herbicides as a treatment method were evaluated. The effects analysis in Chapter 4 of the EA analyzed herbicide use on a number

of organisms and determined this use would be safe if applied properly in accordance with product label requirements, and all applicable state and federal laws.

Unique Characteristics of the Geographic Area

There will be no significant effects to unique characteristics within the proposed project area. Forest Plan standards and guidelines, as well as laws and regulations, are in place to protect such things as wetlands, wild and scenic rivers, and cultural resources.

Effects Likely to be Highly Controversial

Consultation with experts in invasive species, native plant communities, and rare species (New England Wild Flower Society, New Hampshire Natural Heritage Bureau, Maine Natural Areas Program, and the U.S. Fish and Wildlife Service) did not raise any controversial concerns regarding the effects of the proposed action on the physical or biological environment. Nor was scientific controversy identified through comments received from the public during the public involvement process for this project.

Highly Uncertain, Unique or Unknown Risks

Activities being proposed in this decision have been successfully implemented in the past on the Forest. The analysis shows the effects are not uncertain, and do not involve unique or unknown risk (Chapter 4 of the EA). Past knowledge gained through records of previous treatments and research have provided a basis for determining the effects likely to occur in response to the proposed action.

Precedent for Future Actions

The action would not establish a precedent for future actions with significant effects, since the treatment proposal is similar to other treatments conducted on the White Mountain National Forest and surrounding area in previous years. Over time, environmental safety concerns, particularly with using herbicides, have been studied, addressed and refined through research. A number of other entities, including private citizens, have experience with using these treatments on lands outside the Forest.

Cumulative Impacts related to Other Actions

The proposed action does not individually or cumulatively reach a level of significance. The EA (Chapter 4) describes the anticipated cumulative effects on vegetation, soils, water resources, aquatic organisms, wildlife, and threatened, endangered, and sensitive species. I am satisfied after review of the EA that none of the cumulative effects of the alternatives are significant. Where appropriate, treatment protocols are designed to minimize any potential adverse effects.

Effects to Significant Scientific, Cultural or Historical Resources

As described in the EA in sections 2.2.2, each year all proposed NNIS plant treatment sites will be approved by an interdisciplinary team including the Forest archaeologist. During this review, the archaeologist will use field surveys and a review of historic maps and literature to ensure there is no anticipated loss of significant historic or cultural resources. Treatments in or around significant cultural resources will be conducted with the oversight of the Forest archaeologist.

Threatened, Endangered Species and Their Habitats per the Endangered Species Act.

Effects to federally listed plants and animals was analyzed in a Biological Evaluation completed for this project and included consultation with the U.S. Fish and Wildlife Service. This analysis was summarized in the Threatened, Endangered, and Sensitive Species effects section in Chapter 4 of the EA. The proposed action is not likely to adversely affect any threatened or endangered species. There is no designated critical habitat on the Forest, so no effect would occur to this resource.

Federal, State or Local Laws or Regulations that Protect the Environment.

The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws were incorporated into the Forest Plan Standards and Guidelines (Forest Plan pages 2-11 and 2-12), and the Proposed Action complies with the Forest Plan. In addition, project treatment protocols will incorporate the most recent “best management practices” used by state agencies.

6.0 Findings Required by Other Laws and Regulations

The decision to implement Alternative 2 is consistent with the intent of the Forest Plan's long term goals and objectives. The project was designed in conformance with Forest Plan Standards and incorporates appropriate Forest Plan Guidelines. Some other applicable regulatory requirements and laws are listed below:

NFMA (National Forest Management Act)

This project conforms with NFMA in that it tiers to the Record of Decision for the revised White Mountain Land and Resource Management Plan which sets direction for NNIS treatments on the Forest. Proposed treatments will help achieve NNIS objectives and are consistent with Forest Plan Standards and Guidelines.

NEPA (National Environmental Policy Act)

This act requires public involvement and an interdisciplinary approach in consideration of potential environmental effects for proposed actions and alternatives. This Decision Notice and its accompanying Environmental Assessment are used to document compliance with this act.

Endangered Species Act

The White Mountain National Forest completed a site-specific Biological Evaluation (BE) of the potential effects to Threatened, Endangered, Proposed and Sensitive Species (TES). It was determined that there are not likely to be adverse effects to any of these species.

7.0 Implementation Date

If no appeal is received, implementation of this decision may occur on, but not before, 5 business days from the close of the appeal filing period. If an appeal is received, implementation may not occur for 15 days following the date of appeal disposition.

8.0 Administrative Review or Appeal Opportunities

This decision is subject to appeal in accordance with 36 CFR 215.7. A Notice of Appeal must be in writing and clearly state that it is a Notice of Appeal being filed pursuant to 36 CFR 215.7. Appeals must be filed within 45 days of the date of legal notice of this decision in the New Hampshire Union Leader, Manchester, New Hampshire to:

USDA Forest Service, Eastern Region
ATTN: Appeals Deciding Officer, WMNF Forest-wide Invasive Plant Control Project
626 East Wisconsin Avenue
Milwaukee, WI 53202

The office business hours for those submitting hand-delivered appeals are: 8am-4:30pm (Central Time), Monday through Friday, excluding holidays. The Notice of Appeal may also be faxed to 414-944-3963, Attn: Appeals Deciding Officer, USDA Forest Service, Eastern Regional Office; or it may be electronically mailed to www.appeals-eastern-white-mountain@fs.fed.us. Electronic appeals must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), Word (.doc), or any software supported by Microsoft applications.

It is the responsibility of appellants to ensure that their appeal is received in a timely manner. The 45-day time period is computed using calendar days, including Saturdays, Sundays, and Federal holidays. When the time period expires on a Saturday, Sunday, or Federal holiday, the time is extended to the end of the next Federal working day. The day after the publication of the legal notice of the decision in the New Hampshire Union Leader is the first day of the appeal-filing period. The publication date of the legal notice of the decision in the newspaper of record is the exclusive means for calculating the time to file an appeal. Appellants should not rely on dates or timeframe information provided by any other source. If you do not have access to the New Hampshire Union Leader, please call the Pemigewasset Ranger Station at 603-536-1310 for the published date. There will be no time extensions for appeals.

When there is a question about timely filing of an appeal, timeliness shall be determined by:

1. The date of the postmark, e-mail, fax, or other means of filing (for example, express delivery service) an appeal and any attachment;
2. The time and date imprint at the correct Appeal Deciding Officer's office on a hand-delivered appeal and any attachments; or

3. When an appeal is electronically mailed, the appellant should normally receive an automated electronic acknowledgment from the agency as confirmation of receipt. If the appellant does not receive an automated acknowledgment of the receipt of the appeal, it is the appellant's responsibility to ensure timely receipt by other means.

Appeals must meet the content requirements of 36 CFR 215.14. At a minimum, an appeal must include the following:

1. Appellant's name and address, with a telephone number, if available;
2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
3. When multiple names are listed on an appeal, identification of the lead appellant (§215.2) and verification of the identity of the lead appellant upon request;
4. The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
5. The regulation under which the appeal is being filed, when there is an option to appeal under either this part or part 251, subpart C (§215.11(d));
6. Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
7. Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
8. Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and
9. How the appellant believes the decision specifically violates law, regulation, or policy.

The Environmental Assessment for this project is available for public review at the Pemigewasset Ranger District, 1171 Route 175, Holderness, NH 03245. In addition, the EA is posted on the White Mountain National Forest web page (www.fs.fed.us/r9/white). Questions regarding the EA should be directed to Thomas Giles, Assistant District Ranger, 1171 Route 175, Holderness, NH 03245 (phone: 603-536-1310, FAX: 603-536-5147).

9.0 Responsible Official and Contacts

The Responsible Official for the White Mountain National Forest Invasive Plant Control Project is Bernie Gyant, Deputy Forest Supervisor of the White Mountain National Forest.

For additional information concerning this decision or the Forest Service appeal process, contact: Thomas Giles, Assistant District Ranger, Pemigewasset Ranger District at 1171 Rte 175, Holderness, NH 03245, or by phone (603-536-1310), or by FAX (603-536-5147).

//signed – Bernie T. Gyant//
Bernie T. Gyant
Deputy Forest Supervisor

January 29, 2007
Date

APPENDIX D
Responses to Public Comments on the
White Mountain National Forest
Forest-wide Invasive Plant Control Project Environmental Assessment

The **Forest-wide Invasive Plant Control Project** Environmental Assessment was offered for public review and comment for 30 days from November 2 through December 2, 2006. The invitation to comment was promoted through mailings, a Legal Ad in the New Hampshire Union Leader and Lewiston Sun Journal and posting the document on the White Mountain National Forest web site. Six responses were received via conventional mail.

We appreciate the time all respondents spent reviewing this Environmental Assessment (EA) and thank you for your thoughtful comments.

The comments within these letters were sorted into four categories and representative portions of the comments are reprinted below. The complete letters are included in the project file.

1. Support for the Proposed Action
2. Need for Action
3. Completeness of NNIS Inventory Data
4. Application of Herbicides

1.0 Support of the Proposed Action:

Comment 1.1: *“I agree that Alternative 2 is the best plan of action. In fact, it is the only plan which has any chance of success.”*

Comment 1.2: *“Without pretending to have much knowledge or strong opinions on specific bugs, birds, and plants, I would simply say – GO FOR IT!”*

Comment 1.3: *“I commend the Service for taking actions on invasive plants. ... I’m all in favor of your actions to control these invasives.”*

Response: Comments noted and appreciated.

Comment 1.4: *“Again, I commend you and your group for the efforts to put this together and hopefully there will be reports periodically reporting on methods and of your successes and failures in eradicating these invasive growing things.”*

Response: We would expect that through the course of implementing this project we would gain some insights on successful and unsuccessful treatments and it is our intent to share this information with other agencies and the public. Also, the Annual Review (section 2.2.3) includes an evaluation of the effectiveness of various treatments. Sharing this information can be accomplished through a variety of media, such as press releases, the Forest’s web site, and Forest’s Annual Monitoring Report.

2.0 Need For Action:

Comment 2.1: *“At what moment in time do we take a snapshot and declare what is “native” to a region. Or more specifically, what assortment of plants are we declaring to be the native compliment on the WMNF. The 1950 complement? 1865 complement, 1245 complement, 560 BC complement, or even further back in history”*

Response: The term native, as it applies to species in general, and in particular plant species is always a moving target. There is no concrete, scientific way to define this term. Species are constantly in flux; moving themselves to new locales and changing through the process of evolution. These processes if left to their own devices are exceedingly slow, often taking hundreds or thousands of years. It is generally accepted by most ecologists and biologists that the term native applies to those species existing in a particular area or areas of North America prior to European colonization.

What we are concerned with in this document is the presence and impact of non-native invasive species. Invasive species being defined as those non-native species which have a detrimental ecological or economic impact on naturally functioning ecosystems.

Comment 2.2: *“As a taxpayer, I seriously question the notion of funding the Forest Service NNIS eradication effort targeting to create a localized island of a few thousand acres frozen to represent some particular moment in time.”*

Response: The Invasive Species Executive Order 13112 of February 3, 1999 directs federal agencies to use relevant programs and authorities to both prevent the introduction of invasive species detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner. Furthermore, invasives species are listed as one of Forest Service Chief Dale Bosworth’s Four Critical Threats to our nation’s ecosystems. We can not mandate that private or state landowners control invasive species on their landscapes, however we can set an example and demonstrate that invasive species can be successfully controlled and naturally functioning ecosystems preserved.

The White Mountain National Forest and the surrounding landscape is a relatively un-invaded environment when compared to southern New England, the southeast, and the Midwest. Now is the appropriate time to act to control our existing infestations while they are scattered and small. If we do not act at this time, the cost of control and impact of these species on the environment and economy of the White Mountain region will be much greater.

3.0 Completeness of Inventory Data:

Comment 3.1: *“The WMNF has been informed several times in the past year by at least two Hanover residents, that invasive species (buckthorn and Japanese knotweed) exist in the A.T. corridor East of Velvet Rocks and West of lower Dogford Road. Yet the maps issued by the WMNF on the issue of invasives fail to show these invasive locations.”*

Response: We are aware of infestations of invasive species along the Appalachian Trail in Hanover, Lyme and other communities in the area. In some cases the maps do not indicate these infestations due to a lack of exact coordinates by which to map them. In other cases the data

with coordinates has been received, but has not yet been entered into the database. Treatment of these and other infestations along the AT is imperative in order to keep these species infestations from reaching un-infested areas in the WMNF.

4.0 Application of Herbicides:

Comment 4.1: *“I feel there might be a checker to check the checker on the work accomplished and how it is accomplished on a daily basis. It is easy to have workers start to cut a corner especially when working with today’s chemicals, which are taken by so many as no problem to the environment.”*

Response: If pesticides are to be used to control a particular infestation only individuals with federal pesticide applicator’s license may apply any chemicals. Additionally these individuals must be directly supervised in the field by an individual holding s State issued supervisory pesticide applicator’s license. Detailed safety briefings in the form of Job Hazard Analyses are conducted each day prior to any application work. The States of NH and ME, and USFS also require detailed record keeping relating to the type, quantity and location of herbicide applications.