

Non-native Invasive Species Consideration in NEPA Documents

The issue of adequately addressing non-native invasive species (NNIS) is becoming a common item in Appeal Reviews.

In your project level NEPA analysis process, consideration of NNIS should begin during scoping, when team members determine the scope of the effects analysis. Is there likely to be a cause and effect relationship between the proposed activities and the spread of NNIS? The following approach may be helpful in ensuring adequate consideration of NNIS in making this determination and providing documentation for the analysis process.

First, determine your analysis boundaries in time and space. Determine from existing information which NNIS, if any, occur in the vicinity of the project. Disclose whether or not the proposed action includes activities that are likely to introduce NNIS, directly spread NNIS, or create habitat conditions easily colonized by NNIS.

If NNIS are not a problem because, (1) the activities don't cause them to spread, or (2) there are none in the vicinity to be spread, or (3) none are being introduced, use that rationale to document that the scope of the analysis will include no further discussion of NNIS.

If there are NNIS in the vicinity, determine the likelihood of their being spread or encouraged by the proposed action and disclose the relevant site-specific effects expected to be caused by the spread or colonization of each individual invasive species. Include in the analysis such items as the expected extent of spread, location, magnitude, intensity, duration, speed, and direction of spread. Also include a discussion of what particular habitats or other species are likely to be adversely impacted by the spread of NNIS. Document how the project has been modified to address the concerns associated with NNIS.

Finally, consult your Forest Plan or forest NNIS coordinator to determine the need to incorporate control of NNIS into your decision as part of the design criteria or a mitigation measure. If it is uncertain whether or not treatment will be necessary, consider adding specific monitoring to the proposal, or explain how other surveillance programs will be used to gather information. If treatment of NNIS is addressed in another decision, make that disclosure.