

Chapter 1 - Purpose and Need for Action

This chapter:

- Provides a summary of the proposed action;
- Describes the project area;
- Discusses Forest Plan direction related to this project;
- Describes the existing condition of the area as it relates to non-native invasive plants;
- Explains why action is needed (referred to as the “purpose and need for action”);
- Defines the scope of the analysis undertaken for this project;
- Identifies the decisions to be made with this project;
- Lists the applicable laws, regulations, and executive orders related to this project;
- Explains how the public was informed of this proposal, and describes opportunities for public input; and
- Summarizes the issues that were identified as a result of public involvement.

1.1 - Summary of Proposed Action

The Monongahela National Forest proposes to implement vegetation management and associated activities across the Forest over the next ten years to help meet direction in the Monongahela National Forest Land and Resource Management Plan (Forest Plan, USDA Forest Service 2006).

This vegetative management is being proposed to:

- Reduce the risk of nonnative invasive plant species (NNIS) introduction,
- Control NNIS plants that threaten high-interest ecosystems,
- Eliminate emerging infestations, and
- Control NNIS plants that cause problems for resource management.

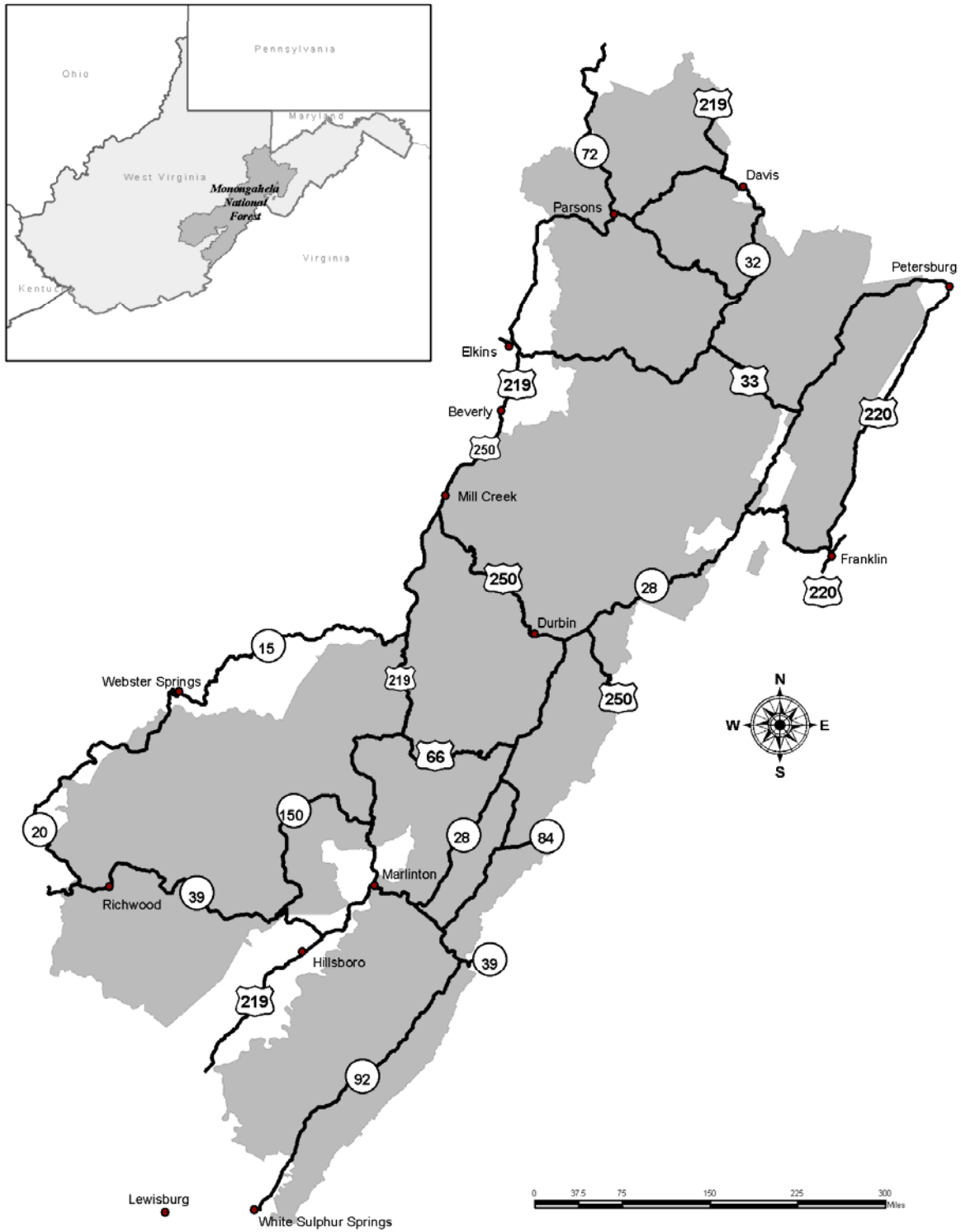
The proposed project includes the following actions:

- Eradication of emerging infestations at trailheads,
- Limiting access and maintenance on roads that constitute high-risk invasion pathways,
- Establishment of programmatic treatment protocols, and
- Site-specific treatments of existing high-priority infestations.

1.2 - Project Area Description

The proclamation and purchase unit boundary of the Monongahela National Forest includes approximately 1.7 million acres in Preston, Tucker, Grant, Barbour, Randolph, Pendleton, Pocahontas, Greenbrier, Nicholas, and Webster Counties, West Virginia. Lands within the boundary consist of approximately 920,000 acres of National Forest System (NFS) lands and about 780,000 acres of private, state, and other federal lands. The Forest includes land in the drainage basins of the Cheat, Elk, Gauley, Greenbrier, Potomac, and Tygarts Valley Rivers.

Figure 1.1. Vicinity Map



1.3 - Forest Plan Direction

National Forest Service land within the proclamation boundary is allocated to several management prescriptions, with management emphases ranging from timber production and age class diversity to wilderness. Management direction for non-native invasive species is contained within Forest-wide direction, which applies to all management prescriptions, although management direction in a particular management prescription can affect how Forest-wide direction is implemented in that management prescription.

Desired Conditions: The Forest-wide integrated desired conditions include the following statement: “[e]xisting non-native invasive species populations are not expanding and new invader species are not becoming established” (Forest plan, p. II-6). Forest-wide desired conditions for vegetation emphasize NNIS prevention by calling for an early detection/rapid response strategy for dealing with new invasive plant occurrences, and also by emphasizing the use of non-invasive species for revegetation efforts. Desired conditions address treatment by encouraging prioritization of existing infestations for treatment based on threats to specific resources and the ability to achieve control (Forest Plan, pp. II-17 and II-18).

Management Direction: Forest-wide goals, standards and guidelines for NNIS give specific direction for achieving desired conditions (Forest Plan, pp. II-19 through II-20). This direction emphasizes prevention, coordination with state and other federal agencies, prioritized treatment of infestations, inventory, and monitoring.

1.4 - Existing Conditions

Non-native invasive plants continue to spread on the Forest. Several rare plant communities are imminently threatened by expanding infestations. Many other high-interest ecosystems and large areas of contiguous federal ownership remain largely un-invaded, but threats to these ecosystems are increasing due to new spot infestations and continued spread along transportation corridors. Control of invasive species continues to be a national and regional priority.

The Forest currently pursues several prevention and treatment strategies for NNIS. We anticipate that these strategies will continue regardless of the decision reached on the proposed project.

- **Public Outreach** – The Forest uses web pages, brochures, posters, and personal contacts with the public to encourage visitors to take preventative measures such as cleaning boots, bicycles, vehicles, horses, carts, etc. prior to recreational visits to the Forest; not bringing livestock forage onto the Forest; using only locally-procured firewood; and other measures as deemed appropriate.
- **Weed-Free Forage and Mulch** – Weed-free forage and mulch (hay) currently is not available in the local area. Therefore, the Forest generally requires that straw be substituted for hay wherever mulch is used. Straw is less likely than hay to contain NNIS because of the

more intensive cultivation under which it is produced. Permits for organized equestrian use on the Forest encourage users not to bring hay on to the National Forest whenever practical.

- **Cleaning of Logging Equipment** – Cleaning of logging equipment prior to use on National Forest land is national and regional policy. This activity is addressed through NEPA analyses for specific timber projects.
- **Follow-up Monitoring and Treatment of Project Sites** – Projects that could contribute to the spread of NNIS generally include monitoring and follow-up treatment of high-priority NNIS. Treatment activities are addressed through NEPA analyses for the specific projects.
- **Weed-Free Seed** – Seed mixtures used on the Forest are tested by the vendor to ensure that they are free of noxious weed seeds.
- **Special Use Permits** – When necessary, special use permits are conditioned to require prevention measures such as seed testing, prohibiting use of hay for mulch, and cleaning of construction and maintenance equipment.
- **Borrow Pit Inspection** – The Forest Plan requires that on-Forest sources of borrow material be inspected to ensure that contaminated material is not used on Forest projects (Standard VE21, p. II-20). Project-specific mitigation measures encourage inspection of off-Forest borrow sources to the extent practical.

The proposed action would expand the Forest's existing NNIS plant management strategy to include treatment of existing and emerging infestations. Such treatments would better implement the NNIS goals and objectives in the Forest plan.

1.5 - Purpose and Need for Action

The purpose of this project is to limit, or where feasible, eliminate, the adverse effects of NNIS plants on ecosystems and other resources. This purpose is in accordance with desired conditions, goals, standards, and guidelines in the Forest Plan, as outlined above. Specific needs that have been identified are listed below:

- Reduce the risk of NNIS plant introduction into currently un-infested areas;
- Control NNIS plants that threaten rare communities and high-interest ecosystems such as botanical areas, candidate research natural areas, National Natural Landmarks, and TES species habitat;
- Control NNIS plants that threaten ecosystem integrity in landscape-scale ecological reserves (wilderness areas, remote backcountry, etc.);
- Eliminate emerging infestations of NNIS that have the potential to develop into large-scale ecosystem-damaging infestations;
- Control NNIS plants that are impeding crop tree regeneration or damaging wildlife habitat improvements; and
- Control NNIS plants that cause management problems for roads and facilities.

1.6 - Scope of the Environmental Analysis

National Forest planning takes place at several levels: national; regional; forest; and project. Analysis for the Monongahela Forest-wide Nonnative Invasive Plant Management Project is a combined analysis of Forest-level programmatic activities and specific project-level activities. Its scope is confined to addressing the purpose and need of the project and possible environmental consequences of the proposal and alternatives. It implements direction provided at higher levels, but does not attempt to address decisions made at higher levels.

Where appropriate, this Environmental Assessment (EA) tiers to the 2006 Forest Plan Final Environmental Impact Statement (FEIS), as encouraged by 40 CFR 1502.20. The FEIS and its Record of Decision resulted in the Forest Plan that embodies the provisions of the National Forest Management Act (NFMA), its implementing regulations, and other guiding documents, and sets forth in detail the direction for managing the land and resources of the Forest. This EA evaluates and documents the effects caused by the proposed activities and various alternatives. The site-specific proposed action and alternatives to it are identified in Chapter 2. The administrative scope of this document can be defined as the laws and regulations that provide the framework for analysis.

1.7 - Responsible Official and Decisions to be Made

The Forest Supervisor of the Monongahela National Forest is the Responsible Official for the Forest-wide Nonnative Invasive Plant Management Project decision. Given the information collected to date, the Forest Supervisor determined that an EA is the appropriate format for documenting the possible environmental impacts of proposed activities. This determination was based on a review of existing resource information and issues. The Forest Supervisor or designated representative will answer the following three questions based on the environmental analysis:

- 1) Will the proposed action proceed as proposed, as modified by an alternative, or not at all?
- 2) If it proceeds, what mitigation measures and monitoring requirements will be implemented?
- 3) Will the project require a Forest Plan amendment?

The decision will be documented in a Decision Notice and made available to the public.

1.8 - Applicable Laws and Executive Orders

The following is a partial list of federal laws and executive orders pertaining to project-specific planning and environmental analysis on federal lands that are addressed in Chapter 3 of this EA:

- Multiple-Use Sustained-Yield Act of 1960;
- National Historic Preservation Act of 1966 (as amended);
- Wild and Scenic Rivers Act of 1968, amended 1986;

- National Environmental Policy Act of 1969 (as amended);
- Clean Air Act of 1977 (as amended);
- Endangered Species Act of 1973 (as amended);
- Forest and Rangeland Renewable Resources Planning Act (RPA) of 1974 (as amended);
- National Forest Management Act of 1976 (as amended);
- Clean Water Act of 1977 (as amended);
- American Indian Religious Freedom Act of 1978;
- Archeological Resource Protection Act of 1979;
- Cave Resource Protection Act of 1988; Executive Order 11593 (cultural resources);
- Executive Order 11988 (floodplains);
- Executive Order 11990 (wetlands);
- Executive Order 12898 (environmental justice);
- Executive Order 12962 (aquatic systems and recreational fisheries)
- Executive Order 13112 (invasive species).

1.9 - Public Involvement

Scoping is the process of gathering comments about a site-specific proposed federal action to determine the scope of issues to be addressed and for identifying any unresolved issues that are related to the proposed action (40 CFR 1501.7).

Public input on proposed NNIS activities was solicited from the general public, Forest Service employees, other public agencies, adjacent property owners, and organizations. Public involvement was sought through various means:

- On April 10, 2008, the scoping letter requesting input was sent to approximately 140 interested parties and landowners. This scoping letter summarized the purpose and need for action, the proposed action, and described various ways to get additional information and how to provide input on the proposal.
- On April 11, 2008, a news release was sent to 14 local newspapers that cover media markets in Randolph, Pocahontas, Tucker, Pendleton, Grant, Greenbrier, Barbour, and Nicholas Counties, as well as the cities of Morgantown, Charleston, Beckley, and Buckhannon. This news release gave a short summary of the purpose and need and proposed action, and described how to get additional information and how to provide input on the proposal.
- The proposal and request for input were posted for review on the Monongahela National Forest's website at www.fs.fed.us/r9/mnf/ under "Forest Planning."

Thirteen individuals and organizations have contacted us about the NNIS proposal in the form of letters, e-mails, or phone calls since the scoping process began in April, 2008 (project record). Comments were used to define issues, develop alternatives, or identify environmental effects.

The official 30-day Notice and Comment period began with the publication of a legal notice in *The Inter-Mountain* newspaper, published in Elkins, West Virginia on March 5, 2009. That notice announced the availability of the Draft NNIS Environmental Assessment (EA and requested comments and input. The Responsible Official and Interdisciplinary Team (IDT) reviewed comments and input. The Decision Notice (DN) and Finding of No Significant Impact (FONSI) for this EA will be signed and distributed to people who commented on the Draft EA, and a legal notice will be published to begin the appeal period.

1.10 - Issues

The purpose of soliciting comments is to determine whether significant issues exist that affect the proposed action or that may be affected by the proposed action. An issue is a point of discussion, dispute, or expression of concern (often about environmental effects). Not all issues are significant issues. Issues may be deemed significant because of the extent of their geographic distribution, the duration or intensity of their effects, or the intensity of interest or resource conflict. They are used to help formulate alternatives, prescribe mitigation measures, or analyze environmental effects. They are also used to determine the scope (49 CFR 1508.25) of the environmental analysis.

The Interdisciplinary Team (IDT) reviewed information received from individuals, adjacent landowners, organizations, internal specialists, and other agencies. The disposition of the comments that were received during the initial scoping period is documented in the project record. One issue was deemed to be significant and is described in the following section.

1.10.1 - Issue: Reduce the Impacts to Forest Resources from NNIS

This issue is the driver behind the purpose and need for the proposed action. Current NNIS populations are negatively affecting many different resources across the Forest, including native vegetation, crop tree establishment, wildlife habitat, livestock forage, and soil productivity. Impacts to these and other resources are described in detail in Chapter 3 of this EA. As NNIS plant populations continue to increase, so will their impacts. The Forest needs to develop a long-term strategy for addressing and reducing NNIS impacts to meet Forest Plan direction and desired conditions related to native vegetation and other resources, as described above.

This issue is so dominant that many scoping comments focused on a desire to expand the proposed action to cover additional NNIS species, additional treatment sites, and to grant a broader programmatic authority to treat unspecified future sites. These comments expressed concern that the proposed action did not include enough high-priority sites, such as specific wildlife openings and botanical areas, or high-priority species, such as multiflora rose and pitcher plants. We do not disagree with these comments, but the reality is that we do not have the workforce or funding to treat all of the NNIS that currently exist across the Forest. That is why the establishment of treatment protocols is such a key component of the proposed action. These protocols would allow us to treat additional infestations, either existing or new, as funds become available and are prioritized for this important task.

The **indicator** for effectively addressing this issue is the potential reduction in NNIS plants and their impacts by alternative, which includes not only treatment of current infestations but also measures to prevent establishment of new infestations. The **units of measure** we will use to compare the effectiveness of the alternatives are:

- Acres of potential NNIS treatment by alternative,
- Treatment protocols established by alternative, and
- NNIS preventive measures proposed by alternative.