

**DECISION MEMO**  
USDA FOREST SERVICE  
Chequamegon-Nicolet National Forest

**“CNNF Non-native Invasive Plant Control Project”  
To Maintain Roads, Trails, and Recreation and Administrative Sites**

On lands in the following Wisconsin counties:

Ashland, Bayfield, Florence, Forest, Langlade, Price, Oconto, Oneida, Sawyer, Taylor and Vilas

**DECISION**

I have decided to control weeds as part of routine maintenance on National Forest roads, trails, recreation and administrative sites. This maintenance is necessary to keep these sites in their desired condition for appropriate and effective use, and dominated by native vegetation. This maintenance will meet presidential direction (EO 13112) to prevent the spread and establishment of non-native, invasive plant species (NNIS).

Control actions will consist of manual methods (hand pulling or hand-tools), mechanical (mowing, or lopping), scorching with a hand-held torch, and spot application of chemical herbicides. These actions would occur as a subset of an integrated weed management strategy on the Forest that includes education, prevention, and eradication activities. When herbicides are used, they will be registered for that use by the EPA, and applied according to label directions. Only herbicide formulations approved by the EPA for aquatic use will be used near wetlands, lakes or streams. Site-specific locations and descriptions of each action are displayed in Attachment 1.

Actions will occur annually into the foreseeable future for up to a decade, unless conditions change to elicit a review of my decision. Annual monitoring of NNIS is performed forest-wide, and reviews of this monitoring are performed on the same frequency (see 2004 LRMP p 4-8, monitoring objective 1.4g).

**REASONS FOR THE DECISION**

**Background:** In response to EO 13112, the Forest began an inventory of NNIS infestations and status in 1997. Evaluation of this inventory, and manual control efforts since then, show that more aggressive action is now needed in order to protect water and soil quality, vegetation diversity, and prevent further spread of NNIS. Some of the problems related to weed infestation:

- In disturbed and high use areas (such as roads, trails and recreation sites), NNIS may out-compete native species, and then spread to natural areas (Ferguson et al. 2003 p 1).
- When an area is dominated by NNIS, it does not buffer erosion and runoff as well as native species (Hoffman & Kearns, 1997 p. 44).
- Many weed species are allopathic, and change the chemistry of the soil so it is no longer productive for native plants (Hoffman & Kearns, 1997 p. 41).
- Invasive species spread and establish much faster than native species as native diseases or pests are not adapted to control them (Tu et al. 2001).
- The economic cost to control weeds without the use of chemical herbicide has already out-paced available resources.

**Purpose and Need:** The need to control weeds is based upon the 2004 LRMP direction, federal and state weeds laws, and a presidential order for federal agencies to control the spread of weeds. Control of NNIS on these particular Forest sites (see Attachment 1) is essential as these sites are high use areas. Forest users come from many different areas bringing weed seed on their vehicles, recreation equipment, and footwear. Weeds have the highest potential of establishment and spread from these high use areas. Desired vegetation and site appearance is at high risk to change if maintenance is not performed to control these invaders. These actions will support Forest Plan goals and objectives (2004 CNNF Forest Plan Goal: 1.4 (Terrestrial Ecosystems), Goal 3.3 (Organizational Effectiveness), forest-wide standards and guidelines (Forest Health and Disturbance Processes, page 2-25; Transportation Systems, page 2-38), and Management Area Direction (Aquatic Desired Condition, page 3-60).

**Rationale:** My decision to control weeds as part of maintenance of roads, trails, recreation and administrative sites is a common and routine practice used on many forests across the nation. Considerable experience in commercial and residential use shows the proposed practices to be effective and safe (see herbicide risk assessments in references). It will produce the desired results and be cost-effective. Monitoring of these sites has shown weeds will not be controlled and are likely to spread without increased control efforts (see Figure 1 and Public Comments in the case file). My action would maintain these sites in a vegetation condition desired by forest users, while reducing environmental impacts from spread and establishment of weeds. No action would continue the current adverse environmental impacts, and continue a slow trend toward weeds replacing native vegetation.

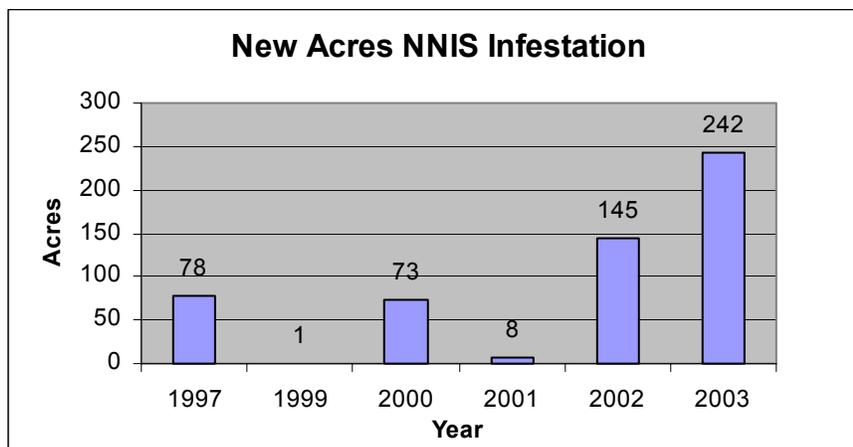


Figure 1. (Note: acre totals are for categories covered in this decision only)

## REASONS FOR CATEGORICALLY EXCLUDING THE DECISION

**Category of Exclusion:** I have determined this action falls under the following categories of action that are normally excluded from documentation in an Environmental Assessment or Environmental Impact Statement pursuant to FSH 1909.15, § 31.12:

**Paragraph 3: Repair and maintenance of administrative sites.**

**Paragraph 4: Repair and maintenance of roads, trails, and landline boundaries.**

**Paragraph 5: Repair and maintenance of recreation sites and facilities.**

Paragraphs 3 and 5 specifically include examples that approve application of registered pesticides for vegetation control. The sites to be maintained lie within National Forest. These actions will not result in a change in the use (type of use or traffic service level) of the affected sites. These actions are routine and consist of practices commonly employed on the Forest.

**Finding that no Extraordinary Circumstances exist:** I have considered conclusions by resource specialist reviews of conditions at the affected sites (Review for Extraordinary Circumstances Worksheet, case file). I find there are no extraordinary circumstances that may result in a significant and adverse, individual or cumulative, environmental effects on the following:

1. Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species. All sites have been evaluated for Federally listed, proposed or sensitive species, or their critical habitat (see Biological Evaluation, case file). No TES species or critical habitat is found on the affected sites.
2. Floodplains, wetlands or municipal watersheds. My decision is to increase protection to floodplains and wetlands. Neither will be adversely affected. No municipal watersheds are affected by my action.

3. Congressionally designated areas. All actions would occur on roaded sites. These actions will not occur in a wilderness or other congressionally designated sites.
4. Inventoried roadless areas. The affected sites do not lie within inventoried roadless areas.
5. Research Natural Areas. The affected area does not lie in or near a Research Natural Area.
6. American Indian and Alaska Native religious or cultural sites. Local and affected American Indian tribal representatives were contacted concerning this action. No effects to religious or cultural sites were identified.
7. Archeological sites, or historic properties or areas. A cultural resource inventory was completed. Project treatment sites were reviewed by the Forest Archeologist and SHPO (see Cultural Resource Assessment, case file). No cultural sites were found on the affected sites, and no effects are anticipated.

**PUBLIC INVOLVEMENT**

The public was informed of the proposed action through the Forest's quarterly schedule of proposed actions (January 2003), and through a mailing to potentially affected parties. Three comments were received by phone, and all supported this action (Public Comments, case file). Based upon public and agency scoping, no extraordinary circumstances have been identified. Consultation included contacts with the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) and the Wisconsin DNR Bureau of Endangered Resources.

**FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS**

I have considered relevant laws, regulations and agency direction. I find my decision complies with the National Forest Management Act, National Environmental Policy Act, Endangered Species Act and the Clean Water Act. I have considered direction in the FSM 1950 and FSH 1909.15 and find the analysis and my decision consistent with that direction.

I have reviewed this action in accordance with Executive Order 12898 (consideration of environmental justice). I find scoping was adequate to inform low income and minority populations that may be affected by this action. No concerns of disproportionate health or environmental effects surfaced. Adverse effects of this action on humans will be very minor or not apparent. Therefore, I find my decision will not disproportionately create high and adverse health or environmental effects to low income or minority populations.

**ADMINSTRATIVE REVIEW AND IMPLEMENTATION DATE**

My decision is not subject to a higher level of administrative review or appeal pursuant to 36 CFR 215.12 (f). This decision may be implemented immediately.

**SIGNATURE AND DATE**

\_\_\_\_\_/s/ Anne F. Archie\_\_\_\_\_  
ANNE F. ARCHIE  
Forest Supervisor

\_\_\_\_\_/October 22, 2004\_\_\_\_\_  
Date

### Literature Cited

- Ferguson, Leslie, C. L. Duncan, and K. Snodgrass. 2003. Backcountry road maintenance and weed management. Tech. Rep. 0371-2811-MTDC. Missoula, MT. U.S. Department of Agriculture, Forest Service, Missoula Technology and Development Center, 22 pp. Copy on file at Chequamegon-Nicolet National Forest.
- Hoffman, R. and K. Kearns. 1997. Wisconsin Manual of Control: Recommendations for Ecologically Invasive Plants. Available online at:  
[www.dnr.state.wi.us/org/land/er/invasive/manual\\_TOC.htm](http://www.dnr.state.wi.us/org/land/er/invasive/manual_TOC.htm)
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- USDA Forest Service. 2002. Assessment of Non-Native Invasive Plant Species on the Chequamegon-Nicolet National Forest, author: M. Sheehan, 18 pp. Copy on file at Chequamegon-Nicolet National Forest.

### Herbicide Risk Assessments

- USDA Forest Service. 1999. Clopyralid (Transline) Final Report. Prepared by Syracuse Environmental Research Associated, Inc. by contract. February 27, 1999. Available on line at: <http://www.fs.fed.us/foresthealth/pesticide/risk.shtml>
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- USDA Forest Service. 2003. Glyphosate - Human Health and Ecological Risk Assessment Final Report. Prepared by Syracuse Environmental Research Associated, Inc. by contract. March 1, 2003. Available on line at: <http://www.fs.fed.us/foresthealth/pesticide/risk.shtml>
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