U.S. Forest Service

Record of Decision

Salmon-Challis National Forest

Noxious Weed Management Program

Custer, Lemhi, and Butte Counties, Idaho

USDA Forest Service

March 2009

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U.S. Forest Service
Record of Decision
Salmon-Challis National Forest
Noxious Weed Management Program
Custer, Lemhi, and Butte Counties, Idaho

I. INTRODUCTION

This Record of Decision documents my decision to select Alternative 1—Ground-Based Herbicide Applications Plus Mechanical, Biological, Controlled Grazing, and Combinations of Treatments for noxious weed treatment and management on the Salmon-Challis National Forest (S-CNF). I propose to implement an integrated series of weed treatment practices that would eradicate, reduce, and/or slow the spread of noxious and invasive non-native populations of weeds. The project area covers more than three million acres of the S-CNF, excluding the Frank Church-River of No Return Wilderness, and includes existing as well as future potential weed infestation sites. Figure 1 shows the boundaries of the S-CNF and its location in Idaho.

Although the Proposed Action was identified as the Preferred Alternative in the FEIS, this Record of Decision describes my rationale for the decision to select Alternative 1 for implementation.

The Notice of Availability was issued in September 2003 announcing the completion of the FEIS. At that time a Record of Decision was not prepared while waiting for consultation through the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) on the Biological Assessment (BA). Formal consultation was requested on April 21, 2004. The FWS provided a letter of concurrence on the BA in August 2004. NMFS provided a Draft Biological Opinion (BO) in December 2006 requesting Forest review. A conference call with NMFS occurred on February 5, 2007 to discuss and resolve comments during the Forest review. A final BO was received on March 22, 2007.

A. NEED TO SUPPLEMENT

The legal requirement addressing the need to supplement a Final Environmental Impact Statement is contained in 40 CFR 1502.9 Draft, Final and Supplemental Statements, which states:

> (c) Agencies:
>
> 1. Shall prepare supplements to either draft or final environmental impact statements if:
>
> (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or

(ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

Addressing items (i) and (ii) above indicates there is no need to supplement the FEIS even though it has been almost six years since completing the analysis. There have been no changes to the Proposed Action, and there has been new information pertinent to the proposed action but nothing that would modify or revise the analysis of effects in the FEIS.

There have been six years of additional weed inventory performed within the Forest since the original data was presented in the FEIS (circa 2001). Since 2002, there has been an increased emphasis on early detection rapid response (EDRR) that expanded the inventory effort resulting in nearly a doubling of weed infested sites (4,924). At the same time, more refined and accurate mapping using Global Positioning System (GPS) and Geographical Information System (GIS) technology has more accurately mapped infested acres showing a reduction by almost half (33,608). Current weed infestation data have been well documented and maintained in the NRIS-TERRA corporate database.

The analysis in the FEIS was primarily based on toxicology fact sheets and risk assessments published in the late 1990s. Since that time the Environmental Protection Agency (EPA) has updated eight herbicide risk assessments performed through contract with Syracuse Environmental Research Associates. A thorough review of these updated risk assessments revealed no modifications to the toxicology assessments. In addition, the NMFS in their Biological Opinion provided a thorough analysis of all the herbicides proposed for use in the FEIS using the updated risk assessments. Their findings revealed no significant changes to the affects analysis.

B. MANAGEMENT INDICATOR SPECIES FOREST PLAN AMENDMENT

The Salmon and Challis Forest Plans were amended in February 2004 to reduce the previous listing of management indicator species (MIS) from 32 species down to four species. The amendment kept two existing management indicator species (pileated woodpecker and bull trout), added two species (Columbia spotted frog and greater sage-grouse) and eliminated 30 species comprised of a variety of mammals, birds, fish, plants, and aquatic insects.

The FEIS addressed the existing condition and environmental consequences for the two existing management indicator species. The two additional MIS are also Region 4 Sensitive Species and as such were also adequately addressed and analyzed in the FEIS. It has been determined that there is no need to amend the FEIS to account for this change in species lists.

C. ERRATA AND ADDENDUMS

Since the Final Environmental Impact Statement and its accompanying Biological Assessment (BA) were completed in 2004 there have been a variety of editorial changes and additional information presented, none of which affected the environmental analysis. Editorial changes are being displayed as a list of Errata while the new information is being displayed as an Addendum. Both the FEIS and the BA have a separate listing as Attachment A to this Record of Decision.

As mentioned above, additional inventories, new species, and weed expansion have occurred over the last six years. This new information is being displayed in tables and maps

as Attachment B to this Record of Decision and can be used to supplement the displays in the FEIS and BA. In addition, the hydrologic unit codes (HUC) and boundaries used in the FEIS have been changed through direction from the U.S. Geological Survey (USGS) and the Federal Geographic Data Committee (FGDC). Both the tables and maps in Attachment B show the new boundaries and codes.

Chapter 9 References in the Final Environmental Impact Statement and VIII References in the Biological Assessment have also undergone considerable editing in order to properly capture the reference citations used in the two documents. These two chapters are attached as Attachments C and D, respectively, to this Record of Decision and should be used as replacement chapters to those in the FEIS and BA.

II. SUMMARY OF THE FOREST SITUATION

Invasive noxious weeds are a serious threat to natural habitats in the West and the problem has exploded in scale during the last several decades. Noxious and undesirable weeds have established themselves throughout the Northwest. Weed inventories on the S-CNF confirm nine species with established populations and 20 species with new populations known to infest more than 33,000 acres on more than 4,900 sites. Table 1 lists the common and scientific names of weeds that are potential, new, and established invaders on Ranger Districts of the S-CNF. Table 2 summarizes the number of infestations and acres on each Ranger District and compares the 2006 data with the 2001 data. It is likely many more infestations are yet to be discovered.

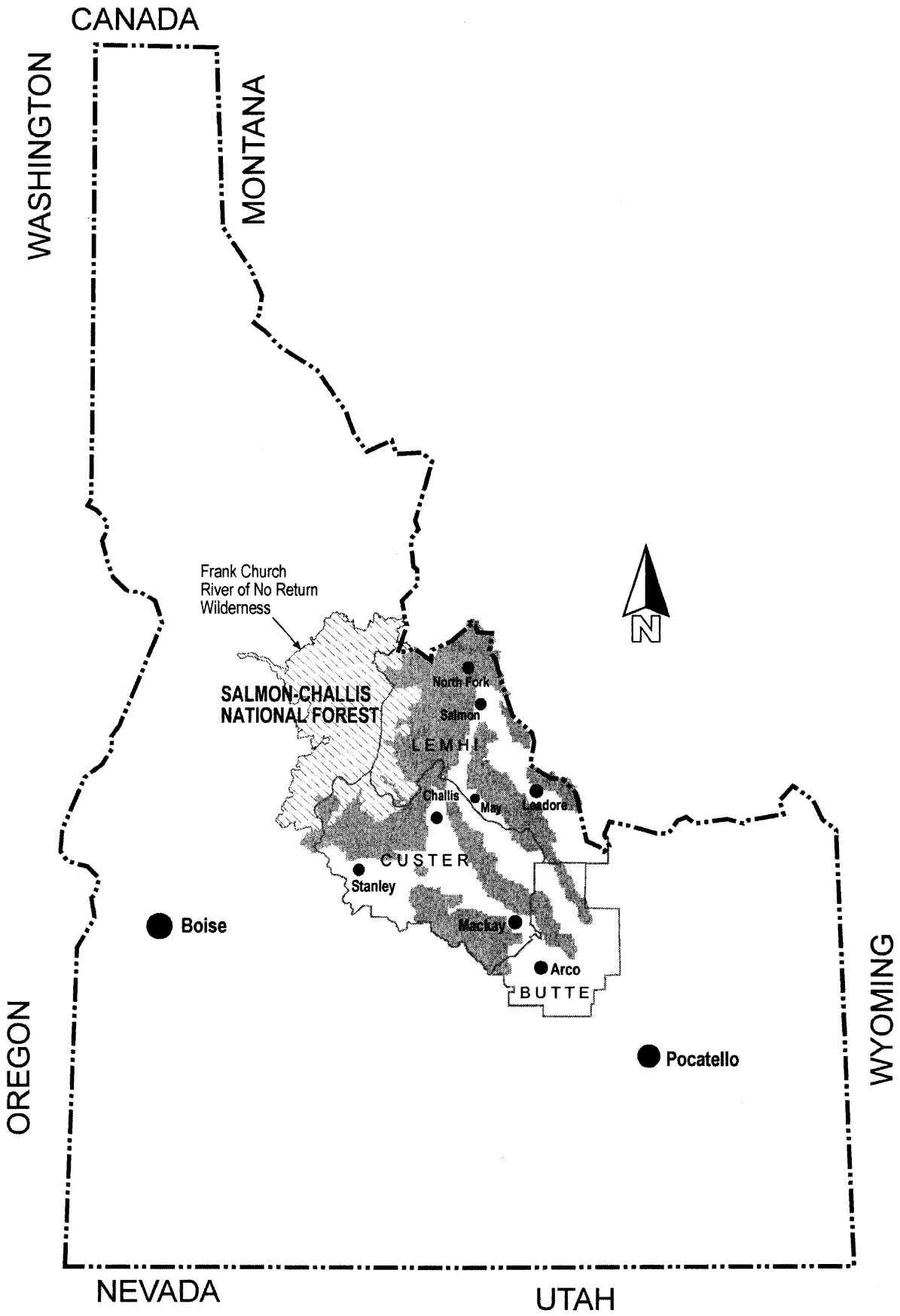

Figure 1
Salmon-Challis National Forest Location Map

TABLE 1
Common and Scientific Names and Plant Codes for Potential, New, and Established Invaders on the S-CNF

Potential Invaders[1]	New Invaders[2]	Established Invaders[3]
Yellow starthistle (*Centaurea solstitalis*)	Rush skeletonweed (*Chondrilla juncea*) CHJU	Spotted knapweed (*Centaurea maculosa*) CEMA4
Purple loosestrife (*Lythrum salicaria*)	Dalmatian toadflax (*Linaria genistifolia*) LIGED	Canada thistle (*Cirsium arvense*) CIAR4
Jointed goatgrass (*Aegilops cylindrica*)	Yellow toadflax (*Linaria vulgaris*) LIVU2	Musk thistle (*Carduus nutans*) CANU4
Skeletonleaf bursage (*Ambrosia tomentosa*)	Russian knapweed (*Acroptilon repens*) ACRE3	Bull thistle (*Cirsium vulgare*) CIVU
Syrian bean caper (*Zygophyllum fabago*)	Sulfur cinquefoil (*Potentilla recta*) PORE5	Leafy spurge (*Euphorbia esula*) EUES
Meadow knapweed (*Centaurea pratensis*)	Hoary alyssum (*Berteroa incana*) BEIN2	Black henbane (*Hyoscyamus niger*) HYNI
Poison hemlock (*Conium maculatum*)	St. Johnswort (*Hypericum perforatum*) HYPE	Hoary cress (whitetop) (*Cardaria draba*) CADR
Field bindweed (*Convolvulus arvensis*)	Houndstongue (*Cynoglossum officinale*) CYOF	Common mullein (*Verbascum thapsus*) VETH
Common crupina (*Crupina vulgaris*)	Common tansy (*Tanacetum vulgare*) TAVU	Cheatgrass (*Bromus tectorum*) BRTE
Scotch broom (*Cytisus scoparius*)	Tansy ragwort (*Senecio jacobaea*) SEJA	
Toothed spurge (*Euphorbia dentata*)	Dyers woad (*Isatis tinctoria*) ISTI	
Yellow hawkweed (*Hieracium pratense*)	Scotch thistle (*Onopordum acanthium*) ONAC	
Orange hawkweed (*Hieraclum aurantiacum*)	Bur buttercup (*Ranunculus testiculatus*) RATE	
Buffalo bur (*Solanum rostratum*)	Field pennycress (*Thlaspi arvense*) THAR	
Perennial sowthistle (*Sonchus arvensis*)	Blue mustard (*Chorispera tenella*) CHTE	
Silver nightshade (*Solanum elaeagnifolium*)	Diffuse knapweed (*Centaurea diffusa*) CEDI3	
Milium (*Milium vernale*)	Perennial pepperweed (*Lepidium latifolium*) LELA2	
Eurasian watermilfoil (*Myriophyllum spicatum*)	Puncturevine (*Tribulus terrestris*) TRTE	
Matgrass (*Nardus stricta*)	Curveseed butterwort (*Ceratocephala testiculata*) CETE5	
Johnsongrass (*Sorghum halepense*)	Oxeye daisy (*Leucanthemum vulgare*) LEVU	

[1] Potential invaders are not currently present on the S-CNF but are present in surrounding counties or states. The potential for their establishment on the S-CNF is high.
[2] New invaders are present on the S-CNF but are limited in distribution and numbers of locations. The potential for their further expansion on the S-CNF is high.
[3] Established invaders are present in high densities or are widely distributed on the S-CNF. The potential for their further expansion on the S-CNF is very high.

The Noxious Weed and Poisonous Plant Control Environmental Assessment (EA) for the Challis National Forest in 1989 reported that "weeds are found as single plants or in small patches of 0.01 acre or in large areas of up to 20 acres widely scattered over the entire National Forest." Target weed species listed included spotted knapweed, Canada and musk thistle, leafy spurge, black henbane, and toadflax, as well as larkspur, a native poisonous plant. The Forest Service reported that the noxious weed project acres covered within the EA totaled 30,020 acres (FEIS pg. 1-4).

In a similar document (Noxious Weed Control Program EA) prepared for the Salmon National Forest in 1987, noxious weed project acres totaled 1,695 acres with six weed species targeted for treatment, consisting of yellow toadflax, leafy spurge, spotted knapweed, Canada and musk thistle, and black henbane. In 1987, spotted knapweed covered an area of 1,000 acres in five drainages on the North Fork Ranger District and a project area of 100 acres on the Salmon and Cobalt Ranger Districts. Data from 2006 indicates spotted knapweed occupies approximately 11,544 acres on 790 sites on the North Fork Ranger District and 10,012 acres on 645 sites on the Salmon-Cobalt Ranger District (FEIS pg. 1-5) (see Figure 2 and Table 2. Note that on Figure 2 the Challis and Yankee Fork Districts are shown as separate Districts while on Table 2 they are combined. The two Districts were combined in 2005).

While spotted knapweed constitutes most of the historic and current problem, a number of other invasive species occur or could potentially occur on the S-CNF. Invasive noxious weeds impact resources such as water quality, wildlife, and the natural diversity of wildlands (FEIS pg 1-14 and Chapter 3). Left unchecked, invasive weeds can:

- Adversely affect rare and sensitive native plant species;
- Degrade habitat for wildlife, especially big game species that depend on foothill and mountain slope forage areas;
- Reduce the forage opportunities for permitted livestock;
- Threaten habitat for waterfowl and upland game birds;
- Deteriorate water quality through increased soil erosion;
- Replace or reduce native plant communities and biological diversity; and
- Diminish the quality of recreational and wilderness experiences.

At the same time that invasive plants are expanding their presence around us, we are beginning to see more examples of successful efforts that use a variety of methods to reduce noxious weeds and recover native plant communities.

III. PURPOSE AND NEED

I have identified the general purpose and need of this project is to prevent and reduce the loss of native plant communities and other S-CNF resources associated with the spread of noxious weeds. Noxious and invasive non-native weeds are spreading on public and private lands at an alarming rate, primarily attributed to human activities associated with vehicles and roads, contaminated livestock feed, contaminated seed, and ineffective revegetation practices on disturbed lands. Wind, water, birds, wildlife, and livestock also contribute to weed spread (FEIS pg. 1-11).

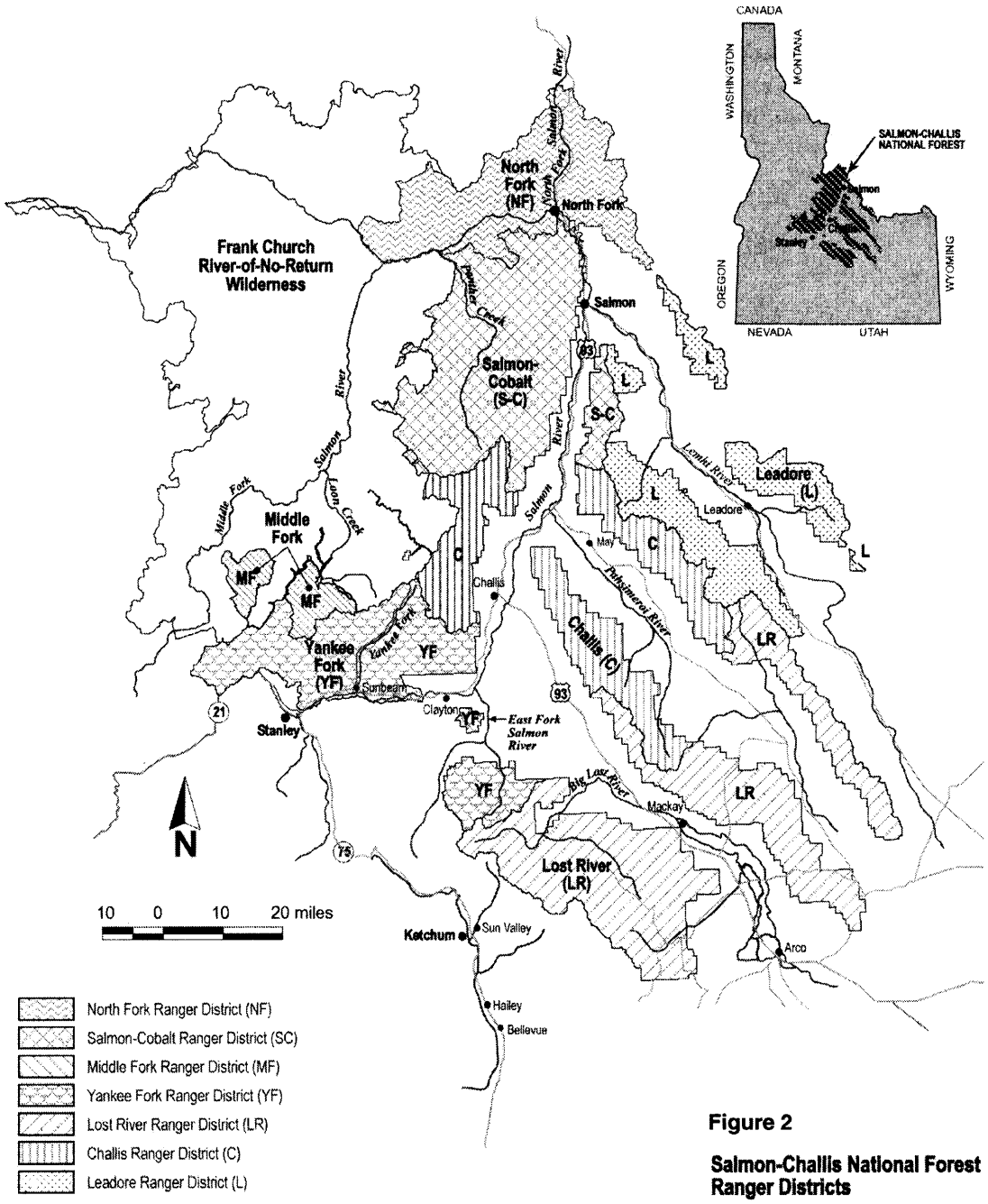

Figure 2

Salmon-Challis National Forest Ranger Districts

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TABLE 2

Number of Noxious Weed Species, Estimated Acres, and Number of Sites of Inventoried Noxious Weed Infestations on Ranger Districts of the S-CNF Comparing 2001 Data and 2006 Data. The Three Dominant Weed Species are Listed for Each District[1, 2]

Ranger District/Dominant Weed Species (2001 acres) (2006 acres)	Total Weed Species		Total Acres		Total Sites	
	2001	2006	2001	2006	2001	2006
Challis-Yankee Fork RD	9	11	1,531	2,289	84	212
1. Spotted knapweed (645) (1,215)						
2. Musk thistle (487) (654)						
3. Canada thistle (241) (274)						
Leadore RD	7	10	1,627	1,888	426	737
1. Spotted knapweed (959) (832)						
2. Musk thistle (442) (648)						
3. Canada thistle (151) (268)						
Lost River RD	8	11	534	3,534	782	462
1. Canada thistle (91) (1,398)						
2. Leafy spurge (308) (717)						
3. Bull thistle (69) (679)						
Middle Fork RD	1	10	25	2,154	8	326
1. Spotted knapweed (25) (1,785) 2. Hoary allysum (0) (269) 3. Bull thistle (0) (55)						
North Fork RD	16	19	54,638	13,246	568	2,334
1. Spotted knapweed (54,568) (11,544)						
2. Hoary allysum (10) (412)						
3. Sulfur cinquefoil (21) (281)						
Salmon-Cobalt RD	13	15	8,182	10,498	856	853
1. Spotted knapweed (7,539) (10,012)						
2. Hoary allysum (<1) (162)						
3. Musk thistle (213) (96)						
Total Acres			66,537	33,608		
Total Sites					2,724	4,924

[1]Excludes the Frank Church-River of No Return Wilderness.

[2]Acres based on values contained in Appendix B (FEIS) and Attachment B (ROD) and rounded to the nearest acre.

The Integrated Scientific Assessment of the Interior Columbia Basin showed that invading weeds can alter ecosystem processes including productivity, decomposition, hydrology, nutrient cycling, and natural disturbance patterns such as frequency and intensity of wild fires. Changing these processes can lead to displacement of native plant species, eventually impacting wildlife and native plant habitat, recreational opportunities, natural hydrologic processes, and scenic beauty (FEIS pg. 1-6).

The original data presented in the FEIS (pp. 1-13 and 1-14) provides a representation of how quickly weeds could potentially spread and dominate the S-CNF under the No Action Alternative (No Change from Current Management). After five years, known weed infestations of approximately 33,608 acres would have doubled or tripled in size. After ten years, weeds would cover more than 200,000 acres (14 percent annual spread) to more than 500,000 acres (24 percent annual spread) of the S-CNF. After twenty years, weeds would cover from just under 1,000,000 acres of the S-CNF at the most conservative spread rate (14 percent annually) to all of the S-CNF lands at the risk of invasion at the least conservative spread rate (24 percent annually). These estimates are a sobering prediction of what could occur if treatment efforts remain at current levels.

We must exercise responsible land management to prevent weed infestations from causing substantial habitat loss, with subsequent loss of plant diversity and ecosystem functions. Lack of effective weed management, in conjunction with the land use patterns around and within the S-CNF, will result in continued infestation onto federally-administered land from non-federal land. Conversely, lack of effective weed management on some federally-administered land may infest neighboring non-federal land or render weed control efforts on adjacent non-federal land ineffective (FEIS pg. 1-14).

Our weed management program identified eight specific project purposes listed below (FEIS pg. 1-6):

- Protect the natural condition and biodiversity of ecosystems and watershed function within the S-CNF by preventing and/or limiting the introduction and subsequent spread of invasive, non-native plant species that displace native vegetation.
- Eliminate new invaders (weed species not previously reported in an area) before they become established.
- Contain and reduce known and potential weed seed sources throughout the S-CNF.
- Prevent or limit the spread of established weeds into areas containing little or no infestation.
- Protect sensitive and unique habitats including Research Natural Areas (RNAs), wetlands, riparian areas, and plant populations.
- Develop criteria to prioritize invasive weed species and treatment areas. These criteria will be used to identify priority weed treatment locations within the S-CNF.
- Comply with and implement current federal and state law, Presidential Executive Orders, Forest Service policies and strategies, and Forest Service plans regarding the control of noxious and other invasive, non-native weeds.

- Cooperate with county, state, other federal agencies, private land owners, and other organizations (including Cooperative Weed Management Areas [CWMAs]) interested in managing invasive weeds.

The Notice of Intent to prepare the EIS for the S-CNF stated that priority would be given to treating areas that may contribute to the continuing spread of weeds into Lemhi, Custer, and Butte Counties within the S-CNF.

IV. DECISION

A. DESCRIPTION OF THE SELECTED ALTERNATIVE

It is my decision to select and implement Alternative 1—Ground-Based Herbicide Applications Plus Mechanical, Biological, Controlled Grazing, and Combinations of Treatments. This decision is based on the comparison of the alternatives and an evaluation of comments received from the public. Alternative 1 appears to best meet the near- and long-term weed management goals for the S-CNF as defined in the project purposes and needs while at the same time recognizing the unforeseen risks associated with aerial herbicide applications that can only be adequately and reliably assessed and mitigated at the project scale. Alternative 1 is identical to the Proposed Action (the preferred alternative in the FEIS) except it does not authorize the use of aerial herbicide application as a treatment option. Aerial herbicide applications may still be possible but only with site-specific environmental analysis and ESA consultation.

1. Weed Treatment Objectives and Priorities

The Integrated Weed Management (IWM) approach incorporates planning and cooperative control strategies between S-CNF personnel and state and county weed control efforts. Presently, S-CNF managers work with Lemhi, Butte, and Custer counties' community-based weed management organizations as coordinated weed management areas (CWMAs), the Frank-Church River of No Return Wilderness CWMA, the Continental Divide CWMA includes parts of Lemhi, Butte, Jefferson, and Clark counties), and the Idaho Noxious Weed Coordinating Committee (INWCC) to coordinate planning and control efforts. This coordination effort is an important part of future weed management strategies. Also, under Alternative 1, future weed management philosophy on the S-CNF will include use of the minimum tool approach as part of a site-specific implementation process when selecting a weed treatment method, and use of an adaptive weed management strategy for treating future, presently undefined weed infestations (FEIS pg. 1-20).

2. Management Goals and Objectives

The overall management goal of Alternative 1 is somewhat less aggressive than the Proposed Action but still focused on maximizing the treatment of noxious and invasive weeds throughout the S-CNF using an IWM approach as quickly as reasonably possible using a broad array of treatment and non-treatment practices to protect the forest and its resources. Specific goals identified for Alternative 1 for all S-CNF Ranger Districts includes:

- Eradicate all new starts (<5 acres in size) of aggressive weeds;
- Reduce established infestations of aggressive weeds 5 to 25 acres in size by 25 to 50 percent;

- Eradicate all new starts (<5 acres in size) of less aggressive weeds;
- Reduce infestations of less aggressive weeds >5 acres in size by 50 percent;
- Reduce established infestations of aggressive weeds >25 acres in size by 25 percent (applicable to the Leadore, Challis/Yankee Fork, Middle Fork, and Lost River Districts);
- Contain established infestations of aggressive weeds greater than 25 acres in size (applicable to the Salmon/Cobalt and North Fork Districts.
- Implement site restoration, revegetation actions (where appropriate), and monitoring programs following treatment to reduce or eliminate the subsequent reinvasion of weeds and to measure degree of treatment success; and
- Employ minimum tool approach and adaptive strategy using the site-specific implementation process.

The Alternative 1 strategy will involve treating approximately 15,000 acres each year using a holistic, systems approach to weed management while employing the best available management techniques to limit weed impact and spread (FEIS pg. 1-14).

Weed treatment objectives under Alternative 1 include eradication (elimination), control (reducing the population over time), and containment (preventing the population from spreading). Weed treatment priorities will be directed to where they have the greatest potential for removing or minimizing the adverse effects of weeds on other S-CNF resource values. Treatment priorities, in descending order, are as follows:

- Eradicate new populations of aggressive weeds
- Control existing populations of aggressive weeds
- Contain existing populations of aggressive weeds
- Eradicate new populations of less aggressive weeds
- Control existing populations of less aggressive weeds
- Contain existing populations of less aggressive weeds

Levels of S-CNF funding, staffing, and other resource availability will ultimately determine the schedule for addressing and implementing treatment priorities. If funding and staffing levels are inadequate for full implementation of the IWM program, treatment at a specific weed site (a custodial action) may be deferred (FEIS pg. 2-17).

3. Weed Treatment Practices

Alternative 1 employs a moderately aggressive, full array of integrated weed treatment practices; restoring and revegetating (where appropriate) sites; developing monitoring programs to follow treatment; implementing a broad range of mitigating Best Management Practices (BMPs) and Standard Operating Procedures (SOPs) employing a site-specific minimum tool approach; and following an adaptive strategy in managing future weed infestations. Options for weed treatment that will be considered for use on a site-specific basis under Alternative 1 include a variety of mechanical, biological, controlled grazing, chemical (ground-based applications of herbicides), and combinations of these treatments. A number of non-treatment practices, which are a cornerstone of IWM programs, will continue under Alternative 1. These IWM practices include proactive weed prevention

programs; weed inventory and early detection; information and education programs; cooperative partnerships and coordination; and compliance with laws, orders, policies, and Forest Plans (FEIS pg. 2-6).

Chemical —Ground-Based Herbicide Applications

Herbicides would be applied according to U.S. Environmental Protection Agency (EPA) product label requirements and in accordance with directions specified in Forest Service Handbooks 2109 and 6709. All herbicide applications would be performed by, or directly supervised by, a state-certified applicator (FEIS pp. 2-9 through 2-16).

The Forest will have the flexibility to use any new or updated (reformulated) chemicals as they are registered and approved by the EPA and added to the Forest Service's list of herbicides approved for use and accompanied by complete risk assessments. A biological evaluation and assessment must be completed. Formal consultation will be initiated with NMFS and FWS if the determination shows affects and, if necessary, a biological opinion must be obtained prior to the use of any new or reformulated herbicides.

Ground-based herbicide application would occur in smaller, fragmented patches of weeds and along trails and roads where chemical treatment may be the most effective means of controlling or eradicating noxious and invasive non-native weeds. Methods of application include broadcast (block) spraying or spot spraying with backpack pumps, spraying from a pumper unit on the back of a pickup truck or an all terrain vehicle, or using pack animals in the transport and application of herbicides in more rugged terrain. Ground-based herbicide application would only occur when wind speed is less than 10 miles per hour.

Mechanical

Mechanical treatment consists of methods that physically destroy, disrupt growth, or interfere with the reproduction of noxious and invasive non-native weeds. These methods can be accomplished by hand, hand tool, or power tool and may include pulling, grubbing, digging, hoeing, tilling, cutting, mowing, or mulching weeds. Mechanical treatment also could include burning weeds with a propane torch. Mechanical treatments would typically be used on a limited basis, primarily to control individual plants or very small, isolated infestations of weeds. Larger infestations of weeds are very difficult to control with mechanical treatment. Furthermore, steep slopes and rocky soils prohibit or limit the use of many mechanical treatment activities (FEIS pp. 2-7 and 2-8).

Biological Control Agents

This treatment consists of using biological controls (agents) such as insects and plant pathogens to attack, weaken, and kill a targeted weed species and reduce its competitive or reproductive capacity. Biological controls are used to reduce densities and rates of weed spread rather than to eradicate weeds. Biological controls may decrease the production of viable weed seed and slow the rate of weed spread. They do not in themselves completely eradicate or contain noxious weed infestations. This treatment is most effective on dense infestations of a weed species covering large areas, but it may take 10 to 20 years for some biological treatments to be effective. Most experts regard the introduction of biological controls as the best long-term solution where there are large, widespread populations of a specific noxious weed species. Optimal biological management would include a

combination of different biological agents that attack or stress different parts of a weed's system (FEIS pp. 2-8 and 2-9).

Controlled Grazing

This treatment category consists of controlling localized infestations of weeds by livestock grazing. Where appropriate, livestock grazing may be integrated with other weed treatments to achieve more effective weed control. Although it can be somewhat seasonal in application, prolonged or coerced grazing by certain kinds of livestock has been used to suppress noxious weeds (FEIS pg. 2-9). For example, sheep can be induced to eat leafy spurge, which is toxic to some livestock but not to sheep or goats. Sheep are known to suppress leafy spurge populations, but they usually do not totally eradicate this weed and will not always graze leafy spurge to the exclusion of native vegetation. Also, sheep grazing leafy spurge (and other weeds) while the seed is maturing will pick up seeds in their fleece, possibly infesting weed-free areas. Goats have been used on a limited basis in efforts to control weeds on portions of nearby lands administered by the BLM Salmon Field Office. Hay, water, or minerals can be used to attract livestock to the weed patch.

Weed control using livestock grazing would be conducted in accordance with Forest Service Grazing Regulations and Regional Policy. A site-specific project operation plan will be developed for the treatment area to consider various factors such as target weed species, type of livestock to be used, forage preference, planned grazing intensity, herding characteristics, topography, onsite water, season of use, and a monitoring program. Forest Service regulations, policies, and the appropriate BMPs would be followed and the project operation plan would be strictly adhered to during all livestock grazing weed treatment efforts (FEIS pg. 2-9). Furthermore, the NMFS deferred consultation on livestock grazing as a treatment tool due to a lack of site specific project design. As a result, further consultation with the National Marine Fisheries Service detailing the project operation plan would be completed prior to initiating a livestock grazing treatment project.

Combinations of Treatments

This treatment category consists of combining several types of weed treatments associated with Alternative 1, as described in the previous text, using the IWM approach to provide diverse coverage for a site exhibiting a range of conditions. This integrated approach also can be used to more effectively treat different life cycles of a single weed species. The intended effect of combining weed treatments into an integrated approach is to collectively increase the stress on a noxious weed species to the point where it dies or loses its competitive advantage and is out-competed by native vegetation. Examples of combinations of treatments include a blend of herbicide and biological controls, herbicide and mechanical controls, mechanical and biological controls, and controlled grazing and mechanical controls (FEIS pg. 2-16).

Non-Treatment Practices

Non-treatment practices are centered around proactive weed prevention and education programs. They are a cornerstone of IWM programs and essential to successfully managing noxious and invasive non-native weeds. A number of non-treatment practices will continue as integral components of the IWM under Alternative 1. These practices include weed prevention, weed inventory and early detection, information and education programs,

cooperative partnerships and coordination, and compliance with laws, orders, policies, and Forest Plans. Appendix A of the FEIS and Attachment E of this ROD provide detailed descriptions of BMPs for weed prevention and management that are followed by Region 4 of the Forest Service and that will continue to be followed on the S-CNF under Alternative 1.

4. Best Management Practices and Standard Operating Procedures

Best Management Practices for weed prevention and management that are followed by Region 4 of the Forest Service will be adhered to under Alternative 1. In addition, BMPs and SOPs specifically associated with non-chemical weed treatments and with ground-based applications of herbicides will be implemented as integral parts of Alternative 1. These BMPs and SOPs are intended to avoid, minimize, or offset the potential for adverse impacts on S-CNF resources. BMPs and SOPs are described in detail in Section 2.D.3, Management Practices and Mitigation Measures (pp. 2-45 through 2-49), and Appendix A of the FEIS. Since Appendix A of the FEIS is a draft FSM 2080, a final FSM 2080 R4 Supplemental 2000-2001-1 is provided as Attachment E of this Record of Decision.

5. Restoration and Monitoring

Alternative 1 provides implementation monitoring, site restoration, revegetation (where appropriate), and effectiveness monitoring following treatment to reduce or eliminate the subsequent reinvasion of weeds, measure the degree of treatment success, and validate buffering effectiveness (FEIS pg. 2-25).

6. Site-Specific Implementation Process and Minimum Tool Approach

Alternative 1 employs a site-specific minimum tool approach (FEIS pp. 2-28 through 2-30) to effectively manage future weed infestations with the least impact on S-CNF resources, uses, and values. During planning, S-CNF managers will select for use the minimum necessary method(s) to accomplish the weed management objectives at a specific site. If all treatment options are equally effective in controlling a particular species or infestation, the method with the least impact will be used. Parameters considered when selecting minimum tools include species biology, infestation size, proximity to water and recreation sites, and sensitive habitats adjacent to infestations. The minimum tool will be determined using a site-specific implementation process and decision tree analysis that evaluates environmental parameters.

7. Adaptive Strategy

An adaptive weed management strategy (FEIS pg. 2-26, Figure 2-1) will be employed to determine appropriate future actions to treat new populations of weeds, expansion of existing weed infestations, or weed infestations that have not yet been inventoried. The adaptive strategy also will cover any new weed species that occur on the S-CNF, any new federal-, state-, or county-designated species of noxious weeds, and any non-designated nuisance weeds present on the S-CNF. The process will include the following:

- Determine the weed species, level of aggressiveness, and infestation size
- Determine the proximity to susceptible habitats, sensitive resources or species, administrative, or recreation sites

- Determine a treatment priority level
- Select and implement a treatment method using the site-specific minimum tool concept
- Conduct site restoration, monitoring, and assess follow-up needs

8. Treatment Areas and Methods

Table 4 summarizes the acres of weed infestations on the S-CNF that will potentially be treated annually under Alternative 1 using various available treatment options. Estimates are based on the species of weeds present, their degree of aggressiveness, and the sizes and numbers of their infestations; corresponding treatment priorities and objectives aimed at eradicating, controlling, and/or containing weeds; and treatment options available for various species of weeds. Alternative 1 provides a moderately aggressive application of a broad array of treatment and non-treatment methods, including the ground-based application of herbicides.

TABLE 3
Estimated Acres of Weed Infestations to be Treated Annually and Possible Treatment Options on the S-CNF for Alternative 1[1,2]

Possible Treatment Options	Number of Acres Treated
Mechanical	100
Biological	2,600
Chemical	7,600
Mechanical and Chemical	200
Biological and Chemical	7,600
Grazing and Chemical	200
Mechanical and Biological	100
Mechanical and Grazing	100
Biological and Grazing	100
Total Acres	18,000

[1]Excludes the Frank Church-River of No Return Wilderness.
[2]Estimated treatment acres based on values contained in Appendix B and information contained in Appendices C and J of the FEIS.

Alternative 1 includes an estimated annual treatment of 18,000 acres of weeds on the S-CNF. A maximum of 15,000 treatment acres per year of herbicides would occur through ground-based application. Treatment locations may either be initial (first time) or follow-up treatments in previously treated areas. The expected timeframes and goals for achieving the management objectives described under Alternative 1 will vary depending on the extent and severity of weed infestations. It is assumed that full funding would be available for implementing Alternative 1 to work toward achieving these goals (FEIS pg. 2-39 through 2-40).

9. Weed Prevention Plan

Weed Prevention. Proactive weed prevention is the first priority in the management of noxious weeds, and consists of proactive measures that reduce or prevent the likelihood of introducing, establishing, and spreading noxious weeds. This practice is an essential consideration in Forest-wide administrative actions such as implementing and enforcing travel plans and the administration of livestock grazing through allotment management plans and annual use permits. Ongoing and proposed S-CNF activities also incorporate project mitigation measures, SOPs, and BMPs that address weed prevention measures pertinent to each project. This program is a critical, and cost-efficient, component of IWM.

Weed Inventory and Early Detection. This practice consists of regularly gathering data on the extent, location, and composition of weed species on the S-CNF for use in refining weed management objectives, determining treatment priorities, and selecting the most effective treatment methods for use.

Information and Education Programs. These programs target both external and internal audiences. External programs are designed to inform and educate the public regarding weed problems on and immediately adjacent to the S-CNF, the effects of weeds on other forest resources, available treatment, and how humans can affect the spread of weeds. Internal programs include S-CNF staff training and monitoring programs. Education includes consultation, brochures, and posters.

Cooperative Partnerships and Coordination. This practice consists of developing cooperative partnerships with groups dedicated to weed management on and adjacent to the S-CNF in concert with the Idaho Noxious Weed Coordinating Committee (INWCC). The top priorities of the Cooperative Weed Management Areas (CWMAs) include involvement of all landowners in a watershed or region, development of IWM Plans, and defining roles and partnerships that allow for blurring jurisdictional lines of ownership to optimize cooperative efforts. Each CWMA works with state, federal, and county officials and neighboring CWMAs to coordinate weed management efforts.

The S-CNF coordinates weed management efforts with several CWMAs: Lemhi County, Custer County, the Lost River (Butte and Custer Counties), and the Continental Divide CWMA (includes parts of Lemhi, Butte, Jefferson, and Clark Counties). An additional CWMA for the Frank Church-River of No Return Wilderness has been finalized and expands coverage in Custer and Lemhi Countries and also includes portions of Idaho and Valley Counties. The S-CNF participates actively in each of these CWMAs by providing workshops, personnel, funds, and equipment for weed control activities on and off S-CNF lands.

Interrelated Projects. An Idaho State Executive Order established the Idaho Invasive Species Council to "provide policy level direction and planning for combating harmful invasive species infestations throughout the state and for preventing the introduction of others that may be potentially harmful." (Executive Order 2001-11, September 26, 2001). The Council includes representatives from federal agencies (including the Forest Service) and the five Native American Tribal governments in Idaho.

Under Idaho's Noxious Weed Management strategy, counties are required to develop local weed control management strategies. Butte, Lemhi, and Custer Counties all have IWM plans (FEIS 2003).

10. Environmental Protection Measures

Described below are the management practices, mitigation measures, BMPs, and SOPs that are pertinent to the selected Alternative 1. Appendix A of the FEIS and Attachment E of this ROD contains information on Forest Service Region 4 BMPs for Weed Prevention and Management are also included with implementation of Alternative 1.

a. Management Practices and Mitigation Measures Common to All Action Alternatives

1. All invasive weed treatment activities will comply with state and federal laws and agency manuals, handbooks, and guidelines.
2. Ground disturbances resulting from weed treatment activities will be revegetated with an appropriate, certified noxious-weed-free seed mix or root stock and fertilized, as necessary.
3. Revegetation will be required for any site within the treatment area with substantial soil disturbance or where the native vegetative density is determined to be inadequate for successful site restoration.
4. Native species will be included in revegetation seed mixes. Use of non-native plant materials on National Forest System lands will be considered as necessary to meet site recovery objectives.
5. A full spectrum of plant species including grasses, forbs, and shrubs (as appropriate) will be used on revegetation sites in order to have the greatest potential to hold the site against weed reinfestation and meet site recovery objectives.
6. Clean all equipment before leaving the project site when operating in areas infested with weeds. Equipment coming from outside the S-CNF must be cleaned prior to entering the S-CNF. Vehicles may be inspected to ensure equipment is cleaned.
7. Provisions will be specified (in the permit and/or operating plan) as needed for the prevention and control of weeds when new and existing use permits are issued/reissued.
8. All weeds that are mechanically or hand excavated after bud stage will be bagged and properly disposed.
9. New biological agents will not be released until approved by the USDA APHIS.
10. A site-specific project operation plan will be required prior to initiating a controlled livestock grazing treatment.
11. Prehistoric trails, remnants of historic structures, and other heritage resources will be protected from disturbance during treatment activities.

12. A 1/2-mile radius no disturbance zone will be implemented from March through August around known great gray owl, northern goshawk, Cooper's Hawk, sharp-shinned hawk, and bald eagle nesting sites; a 1/8-mile no disturbance zone will be implemented around all other raptor nests.

13. Tribal notification to the resource technical staff of dates, locations, maps, and a summary of potential impacts and hazards will be provided to the Tribes so that appropriate notification to Tribal members can be made.

14. When scheduling treatment activities, consider the seasonal harvesting periods of wildlife, fish, and plants to accommodate the needs of the Tribes.

b. Additional Management Practices and Mitigation Measures Applicable to Alternative 1, the Selected Alternative

1. All chemicals will be applied in accordance with EPA registration label requirements and restrictions.

2. Herbicide applicators will obtain a weather forecast for the area prior to initiating a spraying project to ensure no extreme precipitation or wind events could occur during or immediately after spraying that could allow runoff or drift into streams.

3. A Pesticide Application Record (PAR) will be completed on a daily basis for each project area detailing the chemical application, treatment area, target species distribution and density, weather conditions, and recommendations for follow-up treatments or rehabilitation.

4. Treatment areas will be identified on maps available at the Ranger District offices and the Public Lands Office in Salmon, Idaho. The herbicides used, dates of use, and name and phone number to contact for more information will also be available.

5. Application of any herbicides to treat noxious weeds will be performed by or directly supervised by a state- or federally-licensed applicator.

6. Procedures for mixing, loading, and disposal of herbicides as outlined in Appendix D will be followed.

7. Herbicide applications will be coordinated with permit holders within the project areas, as appropriate.

8. Chemical herbicides will not be applied to open water, unless the label specifically allows such applications.

9. No chemical herbicides will be used within a 100-foot radius of any potable water spring development.

10. Specific label directions, recommendations, and guidelines will be followed to reduce drift potential (i.e., nozzle size and pressure, additives, wind speed).

11. No spraying of any herbicide will occur when wind velocity exceeds 10 mph, as per State of Idaho Department of Agriculture standards.

12. No spraying of any herbicide will occur within 50 feet of open water when wind velocity exceeds 5 mph.

13. A 50-foot no-spray buffer zone will apply for broadcast or 'block' applications and a 15-foot buffer will apply for spot applications without adjuvants along all flowing water streams and ponded water bodies. Reduced buffer zones will be considered when using label-approved aquatic formulations (e.g., aquatic 2,4-D).

14. A 50-foot no-spray buffer zone will apply to all perennial and intermittent streams and areas with water tables less than 6 feet deep when applying picloram (Tordon 22K).

15. No spraying of picloram will occur within 100 feet of surface water when wind velocity exceeds 5 mph.

16. No more than one application of picloram in a treatment area will occur per year.

17. Dyes (e.g., Insight, Hilite) will be used in riparian areas, and other locations as appropriate, to provide visual evidence of treated vegetation.

18. All herbicides will be handled following Forest Service Handbook (FSH) 6709 and 2109, and Forest Service Manual (FSM) 2150 guidelines.

19. Herbicide applicators will be familiar with and carry a Herbicide Emergency Spill Plan (Appendix D) to reduce the risk and potential severity of an accidental spill. The plan will identify methods to report and clean up spills should they occur. Herbicide applicators will also carry spill-containment equipment.

20. All treatment sites will be evaluated for sensitive plant habitat suitability. If suitable habitat is present and a field survey has not previously been performed, a properly timed field survey will be performed prior to treatment.

21. No chemical will be applied directly on sensitive plants during spot applications and a 100-foot buffer will be employed around known populations of sensitive plants during broadcast (block) applications.

22. Weed-specific herbicides will be used on big game winter range to minimize impacts to winter forage.

23. Herbicide Transportation by Boat

• Boat operator must be well qualified to operate the particular boat being used for herbicide transportation or treatment. Operator must be very familiar with navigating the sections of river being traveled at the water levels to be encountered during the use period.
• The spray tank will be empty while traveling to and from the treatment area and the launch site, and prior to navigating any class III or higher rapids in the vicinity of the treatment area.
• If a spill should occur within the boat, spray operations will cease until the boat is returned to the launch site or other suitable location for thorough cleaning.
• The boat will be equipped with a manual bilge pump fitted to optionally pump contaminated wastewater in the boat's hull back into the spray tank or into a separate container, and not into the river.

• The boat will be equipped with a separate durable containment compartment for the pump and tank, capable of holding a volume in excess of the capacity of the spray tank.
• Empty collapsible containers sufficient to hold the capacity of the spray tank will be on board in case of a leak in the spray tank.
• An emergency spill containment kit will be on board.
• A watertight compartment or securely fastened watertight storage container will be used for transporting chemical concentrate, which will be triple-wrapped/sealed within the compartment.
• Only those quantities of herbicides necessary for a project will be transported.
• Herbicides transported by boat will be triple-wrapped in plastic and stored in appropriate compartment, such as a designed water proof storage box or a secured plastic cooler. Storage box or coolers will be securely fastened.

24. Boat-Accessed Herbicide Treatment

• A qualified person will be tending the pump at all times while in operation.
• Actual spraying of herbicide will take place only while applicator is on land, and all appropriate riparian buffer strips will be adhered to.
• Excess water in the hull of the boat will be pumped out prior to spray operations in order to lessen the volume of wastewater in the case of a spill within the hull of the boat.
• Boat and spray equipment will be maintained in good running order. Spray hoses and gaskets will be replaced prior to reaching their expected operating life.
• Drafting equipment used for filling herbicide spray tanks will be equipped with back - siphoning prevention devices.
• Precautions will be taken to insure no detectible herbicide residue enters a stream or water body during mixing operations. Mixing must take place in an area where accidental spill will not contaminate a stream or body of water before it can be contained and removed. Mixing of herbicides will normally take place at a distance greater than 100 feet of streams, rivers or lakes.
• Spray equipment properly mounted in a separate containment compartment located within the hull of the boat is considered effective double containment of the herbicide being used. Mixing herbicides is allowed within the confines of a boat by a licensed applicator, when a boat mounted sprayer has been authorized for use and containment components are in place (see above).

V. REASONS FOR DECISION

A. MEETING THE PURPOSE AND NEED

I have evaluated the Preferred Alternative, the No Action Alternative, Alternative 1, and Alternative 2 and have determined that Alternative 1 adequately meets the eight items of the purpose and need in a reasonable, effective, and efficient manner for the following reasons (FEIS Table 2-7 pg 2-52). I realize that with this decision some Forest goals and objectives will not be obtained as readily as with the Preferred Alternative. Noxious weed treatments in large, inaccessible areas must be considered in a case by case basis at the project level in order to fully achieve Forest goals. I agree with NMFS and the FWS that a site specific analysis is necessary for aerial herbicide treatment applications. Recognizing

that additional site specific analysis would be needed to implement aerial applications, all of the objectives of this analysis can be used with Alternative 1.

1. Protect the natural condition and biodiversity of ecosystems and watershed function within the S-CNF by preventing and/or limiting the spread of invasive non-native plant species.

Alternative 1 employs an array of treatment and non-treatment methods to maximize the treatment of weeds as quickly as reasonably possible. Use of adaptive strategy, the minimum tool approach, and site-specific implementation process will manage current and future weed populations.

2. Eliminate new weed invaders before they become established.

Alternative 1 includes an array of treatment and non-treatment methods. It allows for swift response and follow-up monitoring if new weed invaders are discovered and become established.

3. Contain and reduce known and potential weed seed sources throughout the S-CNF.

Known and new discoveries of small weed infestation sites would be effectively eradicated or controlled. Control and containment of larger infestations will be prioritized and reviewed for treatment options under Alternative 1.

4. Prevent or limit the spread of established weeds into areas containing little or no infestation.

Alternative 1 would strive to maintain current weed-free areas in that condition through aggressive inventory and monitoring, and effective application of the adaptive strategy, site-specific implementation process, and the minimum tool approach.

5. Protect sensitive and unique habitats from new and existing weed infestations.

Alternative 1 uses non-treatment methods and an array of treatment options and strategies to aggressively prevent the spread of new and existing weed populations while minimizing potential environmental impacts.

6. Develop criteria to prioritize invasive weed species and treatment areas.

Alternative 1 incorporates in-depth prioritization criteria through identifying treatments based on species of weeds, their degree of aggressiveness, and the sizes and numbers of infestations. Alternative 1 coordinates priorities with treatment objectives and the treatment methods available.

7. Comply with and implement current federal and state laws regarding the control of noxious and other invasive, non-native weed species.

Alternative 1 meets the intent of these laws effectively while considering potential adverse effects to resources.

8. Cooperate with county, state, and other federal agencies, private landowners, and other organizations interested in managing invasive weeds.

Alternative 1 provides for comprehensive weed treatment options providing a range of opportunities for cooperation among other agencies, organizations, and neighboring landowners.

The No Action alternative lacks any expansion of the allowable treatment acres (only up to 3,500) necessary to effectively combat the spread of invasive weeds occurring on the Forest. Alternative 2 lacks the opportunity of using herbicides in the treatment of invasive weeds. This alternative is the least effective alternative in meeting the stated purpose and need.

The Preferred Alternative meets the eight items of the purpose and need more effectively and efficiently than the other alternatives. I believe that aerial herbicide treatment is the only effective way to treat large infestations of noxious weeds in inaccessible areas. If left untreated, these infestations expand in size and weed density, reduce ecosystem health and function, and act as seed sources for further infestations. However, I also realize that noxious weed treatments using aerial herbicide applications must be considered on a case by case basis at the project level and agree with the NMFS and the FWS that a site specific analysis is necessary to reliably assess the risks associated with aerial herbicide treatment applications.

B. HOW THE DECISION RESPONDS TO THE KEY ISSUES

The key issues, an explanation of how Alternative 1 addresses the issues and my rationale for selecting Alternative 1 are discussed below.

1. Potential effects on wildlife habitat, fisheries, native plant communities, threatened/endangered/sensitive (TES) species, vegetation diversity, and ecosystem function because of noxious weeds.

Virtually all the responders were very concerned about the presence of noxious and invasive non-native weeds and the impacts these species have on the natural environment. These species not only colonize disturbed areas but also invade healthy native plant communities, altering native plant communities and wildlife habitat, modifying hydrologic cycles, increasing soil erosion, altering streambank vegetation and sedimentation, and reducing ecosystem integrity and function. These species have the ability to out-compete native vegetation and exponentially expand in size if left untreated. Although the Preferred Alternative is the most aggressive in treating noxious weed infestations, I believe Alternative 1 will be adequately effective in combating these infestations through relatively aggressive treatment and non-treatment actions with the use of ground-based herbicides in combination with mechanical, biological, and controlled grazing. Alternative 1 also includes extensive implementation and effectiveness monitoring to evaluate treatment success, environmental safeguards, and native plant response to the treatments.

2. Potential effects on wildlife species and their habitat from ground and aerial applications of herbicides.

Many responders were concerned about the possible effects herbicides have on wildlife species and their habitat, especially effects from aerial application. After review of the analyses in Chapter 4 of the FEIS (pages 4-34 to 4-49), I believe only minimal adverse effects

from ground-based herbicide spraying is expected for all forms of wildlife and their associated habitat. Several worst-case scenarios of herbicide ingestion were presented showing minimal risk of adverse affects based on established toxicology thresholds. However, I also realize that noxious weed treatments using aerial herbicide applications must be considered on a case by case basis at the project level and agree with the NMFS and the FWS that a site specific analysis is necessary to reliably assess the risks associated with aerial herbicide treatment applications. The use of aerial applied herbicides is not included in Alternative 1, the selected alternative. Alternative 1 includes 53 environmental protection measures, many of which are specific to reducing or eliminating the risk of herbicides on wildlife species. Short-term habitat displacement of most species is the most common adverse impact, while extensive habitat improvement is the most widespread positive impact. Table 4-2 in the FEIS (pgs 4-39 to 4-40) compares the impacts to wildlife source habitats and family groups and clearly shows Alternative 1 with the greatest benefit while considering the unforeseen risks of aerial herbicide applications.

3. Potential effects on fisheries and aquatic habitat from ground and aerial applications of herbicides.

Many responders were concerned about the possible effects herbicides have on fisheries and aquatic habitat, especially effects from aerial application. After review of the analyses in Chapter 4 of the FEIS (pages 4-12 to 4-35), I believe only minimal adverse effects from ground-based herbicide spraying is anticipated on anadromous and resident fish and their aquatic habitat. However, I also realize that noxious weed treatments using aerial herbicide applications must be considered on a case by case basis at the project level and agree with the NMFS and the FWS that a site specific analysis is necessary to reliably assess the risks associated with aerial herbicide treatment applications. The use of aerial applied herbicides is not included in Alternative 1, the selected alternative. Several worst-case scenarios of surface runoff of herbicides were presented showing minimal risk of adverse affects based on established toxicology thresholds. Several criteria of toxicology levels were used in the analysis including the 96-hour LC50, LC50 divided by 10, the maximum acceptable toxicant concentration (MATC), and no observable effect level (NOEL) or concentration (NOEC). The various scenarios indicated a daily treatment acreage limit is reached at which point the risk of herbicide concentrations entering the aquatic habitat and potentially affecting aquatic species is unacceptable. The analysis showed the greatest risk to aquatic species is from accidental spills. Alternative 1 includes 53 environmental protection measures, many of which are specific to reducing or eliminating the risk of herbicides entering aquatic environments or reducing the threat of accidental spills. Alternative 1 also includes extensive implementation monitoring to ensure the protection measures are applied.

4. Potential effects on TES terrestrial and aquatic species from ground and aerial applications of herbicides.

Some responders were concerned about the possible effects of herbicides specifically on threatened, endangered, or sensitive terrestrial and aquatic species. These formally designated species were not analyzed separately in the FEIS but, rather, included in the analyses of the corresponding wildlife and fisheries sections. As discussed in the above narratives, I believe only minimal adverse effects from ground-based herbicide spraying is anticipated on all wildlife and fisheries species and their associated habitats, including TES species. We have prepared a Programmatic Biological Assessment which has been reviewed

by the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS). A concurrence of May Affect, Not Likely to Adversely Affect determination for the four TES wildlife species has been made by the Fish and Wildlife Service. The Service also concurred on a May Affect, Not Likely to Adversely Affect determination for the threatened bull trout when using ground based herbicide application methods. Since the aerial application proposal did not specifically identify locations and treatment acres, both the FWS and NMFS will invoke a 'tiered' consultation approach. This means further consultation and concurrence will be requested and obtained should an aerial application proposal be made that will specifically identify location, treatment acres, the proposed herbicide, and application rate. I agree with the NMFS and the FWS that a site specific analysis is necessary to reliably assess the increased risks associated with aerial herbicide treatment applications. The use of aerial applied herbicides is not included in Alternative 1, the selected alternative.

We have concurrence from NOAA Fisheries that the action is not likely to jeopardize the continued existence of Snake River Basin steelhead, Snake River spring/summer Chinook salmon, or Snake River sockeye salmon or result in adverse modification or destruction of their designated habitat. However, a variety of sublethal effects on fish are reported for the herbicides evaluated in the NOAA Fisheries Biological Opinion, at concentrations that are likely to occur in the action area, and as such, are likely to cause an incidental take of listed species. The analysis in the BA included additional toxicology analyses to determine Risk Quotients and Level of Concern for each proposed chemical. Out of the eleven chemicals proposed for use, ten have a low level of concern and one has a moderate level of concern. The one with a moderate level of concern has limited applications to minimize risks to aquatic TES species.

5. Potential effects on TES plant species from ground and aerial applications of herbicides.

Some responders were concerned about the possible effects of herbicides specifically on threatened, endangered, or sensitive plant species. The S-CNF does not have any formally designated TES plant species. The Forest does, however, support several Region 4 Sensitive species. These species were not analyzed separately in the FEIS but, rather, included in the Vegetation Resource analysis (FEIS pgs 4-2 to 4-12). A Programmatic Biological Evaluation has been prepared (FEIS Appendix L) analyzing the effects of the Proposed Action on these species in addition to the effects noxious and non-native invasive weeds have on sensitive species and their habitats. Many sensitive plant species occupy unique habitats that are susceptible to weed invasion. Weeds threaten the existence of these species by competition and altering their unique or sensitive habitats.

I realize that noxious weed treatments using aerial herbicide applications must be considered on a case by case basis at the project level and agree with the NMFS and the FWS that a site specific analysis is necessary to reliably assess the risks associated with aerial herbicide treatment applications. The use of aerial applied herbicides is not included in Alternative 1, the selected alternative. Alternative 1 incorporates the use of the minimum tool concept and the decision tree designed to eliminate or minimize potential impacts to sensitive or unique habitats. Alternative 1 includes 53 environmental protection measures, many of which are specific to reducing or eliminating the risk of disturbance to sensitive plants or their habitat, including requiring field inventories when plant presence is unknown and applying buffer zones. Given these safeguards and protective measures, I

believe only minimal adverse effects from herbicide spraying, mechanical treatments, or controlled grazing may be anticipated on sensitive plant species and their habitat.

6. Potential effects on human health from ground and aerial applications of herbicides.

Virtually all responders were concerned about the possible effects of herbicides have on human health. After a thorough review of the analyses in Chapter 4 of the FEIS (pages 4-81 to 4-95), I have reached the conclusion that only minimal to no adverse effects from ground-based herbicide application is expected to the human population. The analyses included numerous toxicology reviews for oral, dermal, inhalation, and eye contact, for both acute and chronic toxicity, for all the proposed chemicals and concluded only minimal risk providing the necessary label precautions are followed. However, I also realize that noxious weed treatments using aerial herbicide applications must be considered on a case by case basis at the project level and agree with the NMFS and the FWS that a site specific analysis is necessary to reliably assess the risks associated with aerial herbicide treatment applications. The use of aerial applied herbicides is not included in Alternative 1, the selected alternative. Alternative 1 includes 53 environmental protection measures, many of which are specific to applicator and public health. The analysis further indicated that the risk of adverse impacts from secondary dermal contact or ingestion from harvesting sprayed vegetation is also minimal.

I realize that we may not know all there is to know about the long-term effects of herbicides on humans, wildlife, and aquatic species. However, we do know the effects of weeds on our native plant ecosystems. In my mind, the significant negative effects that the noxious weed infestations have on the integrity of our ecosystems in the Salmon-Challis National Forest outweigh the few unknowns of herbicide application. I feel it is a reasonable and prudent action to go forward with an integrated weed management strategy using the best information available on the effects of herbicides.

C. OTHER FACTORS CONSIDERED IN MAKING THE DECISION

Many scientists, special interest groups, citizens, and county, state, and federal agencies recognize the need to incorporate certain specific features essential for successful treatment of noxious weeds and protection of native plant communities. Although Alternative 1 is not as aggressive in the treatment of noxious weeds as the Preferred Alternative (Proposed Action), I contend Alternative 1 contains all of the important features (detailed below) that adequately meet project purpose and need along with addressing the key issues.

To Be Effective Requires Vigorous Action—Invasive weeds are expanding their presence on the S-CNF. A weak or inadequate weed control response will fail with severe consequences. Current activities do not appear able to resist the more aggressive invasive plant species without human intervention in a variety of ways. Secondly, an inadequate response to the invasive weed threat will contribute to the advance of weeds over the landscape because the more aggressive weed species will not remain static. They will continue to spread over the habitat unless they are controlled by strong integrated actions of land managers and the general citizenry.

In the Future, the Problem Must be Dealt with at the Appropriate Larger Scale—The S-CNF Noxious Weed Management Program has identified noxious weed control as an

important Forest-wide goal (FEIS); however, in the last few years, spotted knapweed and other species have continued to increase on many roads, trails, and various wildlife habitats.

Until now, weed control efforts have been relatively small and limited in success, relying primarily on small-scale herbicide applications and weed prevention measures. Alternative 1 gives the Forest the variety of tools needed to begin dealing with the large-scale problem in a more effective way to fulfill the direction and intent of the Forest Plan.

Recognize the Importance of Integrated Weed Management and Use a Broad Array of Actions to Combat the Problem of Invasive Weeds—The cornerstone of this project is the application of the principles of integrated noxious weed management. The concept was developed to address larger scale threats of invasive plant infestations.

Integrated noxious weed management looks at all aspects of the control effort including:

- Prevention and education;
- Detailed inventory of location, extent, and species of problem plants;
- Prioritizing treatment areas for the most control and benefit;
- Making treatment methods available that best fit the situation, including biological controls, a selection of appropriate herbicides, mowing, hand pulling and other mechanical methods, controlled grazing, and seeding and planting desirable species (where appropriate); and
- Implementation of a site-specific, minimum tool, adaptive weed management strategy

Proceeding With Caution and Modifying Our Tactics Through Adaptive Management to Improve Our Effectiveness—Alternative 1 dictates a conservative implementation approach by phasing in and closely monitoring activities such as ground-based herbicide application, biological controls, and controlled grazing. This will allow adjusting actions as more is learned through implementation and effectiveness monitoring. The adaptive management approach permits us to select from a menu of invasive weed control techniques to improve treatment effectiveness. It allows for the proactive ground application of herbicides by using backpack, mule-mounted equipment, ATV, or trucks on roads, trails, and open sites with the objective of eradicating new invasive weeds and pushing back the extent of existing weeks.

The decision focuses the treatment actions by defining specific objectives that are consistent with management goals for each treatment site. The project will tailor treatment objectives to match different species and sizes of infestations. With more than 33,000 acres of the S-CNF currently affected by invasive weeds with the potential for expansion, this decision judiciously focuses herbicide use on the highest priority sites.

Staying Effective through Follow-up Monitoring—Alternative 1 establishes an improved, more comprehensive system for tracking successes and identifying new problems, as well as a framework for finding, mapping, and prioritizing occurrences of species of concern. Implementation and effectiveness monitoring results will provide a basis for evaluating the success of the noxious weed management program on the S-CNF.

D. SUMMARY OF RATIONALE

Each of the alternatives considered in the FEIS has benefits and drawbacks relative to the purpose and need, issues, and/or public concern. The purpose and need was developed through direction in the Forest Plan and other national and regional laws and policies, as well as through environmental monitoring results. Among the alternatives evaluated, and acknowledging that aerial herbicide applications require a more site specific affects analysis prior to consideration, I believe Alternative 1 best meets the project purposes and needs, contains the most aggressive and flexible treatment practices for achieving noxious weed management goals, and provides the greatest weed treatment benefits at the lowest cost per acre (FEIS Tables 2-7 and 2-8). Alternative 1 will be the most effective of the alternatives evaluated in eradicating, controlling, and containing noxious weeds on the S-CNF, benefiting the overall forest health and a broad range of S-CNF resources, while assuring adverse environmental impacts are effectively mitigated (FEIS Table 4-8, pp. 4-112 through 4-121).

VI. ISSUES AND PUBLIC COMMENT

Public involvement formally began with the publication of a Notice of Intent to prepare a Draft EIS on December 14, 2001. A project scoping letter was mailed to 502 individuals, interest groups, local governments, and other agencies on December 18, 2001. The Shoshone-Bannock Tribes were sent a government-to-government letter on January 15, 2002, describing the project and requesting input.

Three public scoping meetings were held in the three local communities surrounding the project area in early January 2002 (Arco, Idaho, on January 8; Challis, Idaho, on January 9; and Salmon, Idaho, on January 10). Notices of the public meetings appeared in the three local newspapers (Arco Advertiser, Challis Messenger, and Salmon's Recorder Herald) during the week of December 24, 2001. Notices of the public meetings also were announced over the local radio station (KSRA) in Salmon and Challis the week of January 1, 2002.

A total of 25 individuals or organizations responded with 88 written comments on the proposed project as a result of public scoping.

In response to public comment, four alternatives were identified and the Proposed Action refined to maximize the effect of weed treatments while incorporating additional environmental protection measures and monitoring.

Based on comments received from the public during and following scoping meetings (see Section 2.B.3, Public Responses and Concerns in the FEIS), there appears to be little opposition regarding the use of chemicals or livestock as weed treatment options on the S-CNF. In addition, it appears there is support for using the full array of weed treatment options and the need to include provisions for chemical use, acreage, and treatment site flexibility on the S-CNF.

Although there is acceptance of the use of chemicals in the treatment of noxious weeds, there is still a concern over the environmental and health risks herbicides pose. However, in general, the public recognizes that noxious weeds pose a greater threat to the physical, biological, and ecological environment of the S-CNF. These environmental and health concerns led to the development of six key issues listed below that are fully addressed in each of the four alternatives analyzed in detail in the FEIS.

1. Potential effects on wildlife habitat, fisheries, native plant communities, threatened/endangered/sensitive (TES) species, vegetation diversity, and ecosystem function because of noxious weeds.
2. Potential effects on wildlife species and their habitat from ground and aerial applications of herbicides.
3. Potential effects on fisheries and aquatic habitat from ground and aerial applications of herbicides.
4. Potential effects on TES terrestrial and aquatic species from ground and aerial applications of herbicides.
5. Potential effects on TES plant species from ground and aerial applications of herbicides.
6. Potential effects on human health from ground and aerial applications of herbicides.

Some respondents recognized the need to address human-caused activities or uses that lead to or exacerbate weed expansion, encroachment, and establishment—namely, livestock grazing, logging, roads, mining, and recreation off-highway vehicles. These concerns led to an additional issue:

7. Human uses exacerbate the spread and establishment of noxious and invasive non-native weeds. Without a proactive prevention strategy that limits, modifies, or curtails current human uses on the S-CNF, any type of physical treatment will not be successful in controlling weeds.

This issue led to the development and consideration of an additional alternative—the Proactive Prevention Alternative—that alters the original intent and scope of weed treatment activities and focuses on taking action on numerous human use activities as a means to actively prevent the establishment and spread of weeds, while at the same time incorporating the full range of weed treatment activities where absolutely necessary.

After careful review the Proactive Prevention Alternative was ultimately dismissed for further consideration as being outside the original intent and scope of the purpose and need, in addition to being contrary to Forest Plan decisions authorizing these activities. In my opinion, to consider a strategy that focuses only passively on weed treatment options and actively on the elimination of authorized Forest uses is not an effective treatment alternative. Elements of this approach are a part of an integrated weed management strategy, such as called for in the selected Alternative 1.

The Notice of Availability for the DEIS was published in the Federal Register on November 15, 2002, formally initiating a 60-day comment period. Notices were published in local newspapers and three public meetings were held in December 2002. A total of 13 comment letters were received, many of which expressed opinions about which alternative should be selected, environmental and human health risks from the use of herbicides, and the rationale for dismissing the Proactive Prevention Alternative.

The FEIS was developed by incorporating and reviewing comments on the DEIS from the public and responses to those comments. The FEIS was filed with the EPA and made available to the public on September 24, 2003. The FEIS was mailed to commenters and

others who requested a copy of the document. A hard copy and compact disc of the FEIS were also made available for public review at Forest Service Headquarters in Salmon, Idaho.

VII. OTHER ALTERNATIVES CONSIDERED

In addition to Alternative 1, the selected alternative, described above, I have considered three other alternatives which are discussed below. A more detailed description of these alternatives can be found in the EIS on pages 2-30 through 2-44.

A. PROPOSED ACTION—AERIAL AND GROUND-BASED HERBICIDE APPLICATIONS PLUS MECHANICAL, BIOLOGICAL, CONTROLLED GRAZING, AND COMBINATION OF TREATMENTS

The Proposed Action was identified as the Preferred Alternative and is identical to Alternative 1 except the Proposed Action provides for the use of aerial herbicide application. It includes strategies for awareness and education, early detection and proactive prevention of noxious weeds, the use of all treatment tools, followed by restoration and revegetation and monitoring of weed-impacted areas, and implementation of a broad range of mitigating BMPs and SOPs. Weed treatment priorities would be directed to where they have the greatest potential for removing or minimizing the adverse effects of weeds on other S-CNF resource values.

The Proposed Action contains the most aggressive and flexible treatment practices for achieving the noxious weed management goals and would provide the greatest weed treatment benefits at the lowest cost per acre.

B. NO ACTION ALTERNATIVE—NO CHANGE FROM CURRENT MANAGEMENT

Weed treatments on the S-CNF were very limited prior to 1995. Since then, acres of lands treated have generally increased each year from 586 acres in 1995 to 3,371 in 2001 (FEIS pp. 2-36 and 2-37) and 4,483 acres in 2007. Virtually all of these acreages were treated using ground-based herbicides. Monitoring has been geared toward program implementation and measuring the effectiveness of treatments on target species. The current level of weed treatment is considerably less than known weed infestations (greater than 33,000 acres) on the S-CNF. New invaders continue to establish populations on the S-CNF and would likely increase in size unless a more aggressive noxious weed management program is developed and implemented.

The No Action Alternative would continue the same weed management programs, treatments, and levels of effort for controlling noxious weeds on the S-CNF as are currently being used. The No Action Alternative does not include a forest-wide action plan to reduce or eliminate the spread of weeds, an adaptive weed management strategy, or minimum tool approach. Site restoration and monitoring activities are limited in scope. Expanding target species, treatment acres, or choice of chemical requires further National Environmental Policy Act (NEPA) analysis and documentation, constraining S-CNF managers from responding in a timely and cost-effective manner to new weed infestations.

C. ALTERNATIVE 2—MECHANICAL, BIOLOGICAL, CONTROLLED GRAZING, AND COMBINATIONS OF TREATMENTS (NO HERBICIDE APPLICATION)

The objective of Alternative 2 is to increase the level of noxious weed management throughout the S-CNF compared to current conditions using mechanical, biological, controlled grazing, and combinations of these treatments. Except for the exclusion of herbicides, integrated weed treatment and non-treatment practices, prevention, restoration and monitoring, adaptive strategy and minimum tool, and the site-specific implementation process would be implemented the same as under the Proposed Action and Alternative 1. Herbicides would not be applied under Alternative 2, and they would not be authorized for future use in the adaptive weed management strategy under this alternative. This would limit the choice, and in most cases, the effectiveness of treatments available for various species and sizes of noxious weed infestations. It would also limit the flexibility to select from a wide range of treatment options if initial treatments are unsuccessful and re-treatments with a different option are necessary.

The expected timeframes and goals for accomplishing the Alternative 2 management objectives would vary depending on the extent and severity of weed infestation—the same as for the Proposed Action and Alternative 1. However, it is anticipated that because there are fewer treatment methods available for use under Alternative 2, it is not likely that the same level of success would be achievable as the Proposed Action or Alternative 1. This is especially true for the North Fork and Salmon-Cobalt Ranger Districts where weed infestations are considerably more extensive than on the other five S-CNF Ranger Districts.

D. OTHER ALTERNATIVES CONSIDERED BUT DISMISSED FOR FURTHER CONSIDERATION

The Proactive Prevention Alternative, developed through public scoping, alters the original intent and scope of weed treatment activities and focuses on taking action on numerous human use activities as a means to actively prevent the establishment and spread of weeds, while at the same time incorporating the full range of weed treatment activities where absolutely necessary.

After careful review the Proactive Prevention Alternative was ultimately dismissed for further consideration as being outside the original intent and scope of the purpose and need, in addition to being contrary to Forest Plan decisions authorizing these activities. In my opinion, to consider a strategy that focuses only passively on weed treatment options and actively on the elimination of authorized Forest uses is not an effective treatment alternative. Elements of this approach are a part of an integrated weed management strategy, such as called for in the selected Alternative 1.

VIII. LEGALLY REQUIRED FINDINGS

Numerous laws, regulations, and agency directives require that this Decision be consistent with their provisions. To the best of my knowledge, my decision to select Alternative 1 is consistent with all laws, regulations, and agency policy relevant to this project. The following discussion is not an all-inclusive listing but is intended to provide information on the areas raised as issues or comments by the public or other agencies.

1. National Forest Noxious Weed Management Policy (FSM 1080-2083)

Alternative 1 is consistent with the National Forest Noxious Weed Management Policy, which requires District Rangers to prevent the introduction and establishment, and provide for the containment and suppression, of noxious weeds; and to cooperate with state agencies. The policy is consistent with the Federal Noxious Weed Action of 1974, as amended (7 USC 2801 *et seq.*).

2. Idaho's Noxious Weed Control Act

Under Idaho's Noxious Weed Control Act (I. C. § 22-2401 *et seq.*), it is unlawful for an individual to allow noxious weeds to propagate or go to seed on their land unless they are complying with an approved management plan. The law directs counties to develop weed control districts to plan and implement weed control efforts. County weed boards must make all reasonable efforts to develop and implement a noxious weed program covering all land within the district owned by the federal government. Idaho's noxious weed statutes and regulations require coordinated efforts among the state and federal agencies, and counties to control designated noxious weed populations.

3. Endangered Species Act (ESA)

The S-CNF Wildlife Biologist, Fisheries Biologist, and Botanist have evaluated Alternative 1 with regard to threatened and endangered animal and plant species. Findings are summarized in the effects analysis in Chapter 4 of the FEIS and in the Programmatic Biological Evaluation in Appendix L of the FEIS. The Programmatic Biological Assessment only specifically addressed the Preferred Alternative (Proposed Action). However, The Proposed Action and Alternative 1 are identical except for the use of aerial herbicide applications. Both the Fish and Wildlife Service (U.S. Fish and Wildlife Service 2004) and the National Marine Fisheries Service (National Marine Fisheries Service 2007) have concurred on a determination of affects for the appropriate terrestrial and aquatic threatened and endangered species.

Under provisions of the ESA, federal agencies are directed to seek to conserve endangered and threatened species and to ensure that actions authorized, funded, or carried out by them are not likely to jeopardize the continued existence of any threatened or endangered species or result in the destruction or adverse modification of their critical habitats.

On January 25, 2002, the U.S. Fish and Wildlife Service (FWS) provided a consultation letter on the proposed project and information on endangered and threatened species to the S-CNF. Subsequent consultation letters from the USFWS were received. Consultation also occurred with the Shoshone-Bannock Tribes and the NMFS regarding anadromous fish species. Consultation continued throughout the preparation of the FEIS and will be ongoing as part of the IWM strategy described in the FEIS.

4. Sensitive Species

Federal law and direction applicable to sensitive species include the National Forest Management Act and the Forest Service Manual 2670. The Regional Forester has developed the sensitive-species list—those plants and animals for which population viability is a concern (FEIS—Chapter 3, Wildlife, Fish, and Vegetation sections). Prior to selecting

Alternative 1 for implementation in this Decision, analyses and projected effects on all sensitive species listed as occurring or possibly occurring on the S-CNF (FEIS—Chapter 4, Wildlife, Fish, and Vegetation sections and Appendix L—Programmatic Biological Evaluation) were reviewed. These findings support the conclusion that Alternative 1 will have no long-term adverse impacts on sensitive species.

5. Clean Water Act

Based on the measures outlined in the FEIS to protect soil and water resources and the soil, water, and aquatic resources analyses in Chapter 4 of the FEIS, Alternative 1 meets the intent of the Clean Water Act.

6. The National Forest Management Act of 1976 (PL-94-588)

The National Forest Management Act (NFMA) and accompanying regulations require that several other specific findings be documented.

Forest Plan Consistency—Management activities are to be consistent with the Forest Plan [p16 USC 1604 (I)]. The Forest Plan guides management activities [26 CFR 219.1 (b)]. Consistency with the Forest Plan is discussed in the FEIS Chapter 4 as appropriate by resource and in Section 4.H. (Forest Plan Consistency).

Resource Protection—The following address resource protection requirements of the NFMA:

- Alternative 1 conserves soil and water resources and does not allow significant or permanent impairment of the productivity of the land.
- Within the scope of the project and consistent with the other resource values involved, activities will minimize risks from serious or long-lasting hazards.
- The purpose of the project is to prevent or reduce serious, long-lasting hazards, and damage from noxious weeds, using principles of integrated weed management.
- Alternative 1 will protect bodies of water.
- Alternative 1 will provide for and maintain a diversity of plant and animal communities by reducing displacement of native plant species and by aggressively treating invader species.
- Alternative 1 will maintain sufficient habitat for viable populations of existing native vertebrate species.
- The FEIS assesses potential physical, biological, human and socioeconomic, and cultural impacts of Alternative 1 and is consistent with multiple uses planned for the Forest.
- Alternative 1 prevents the destruction or adverse modification of critical habitat for threatened or endangered species.
- There are no right-of-way corridors needed to accommodate the project.
- There is no road construction associated with this project.

- No temporary roads will be built.
- Applicable federal, state, and local air quality standards will be met.

Riparian Areas, Soil and Water—All riparian areas, soil, and water will be protected as described in the FEIS and this document.

Diversity—The purpose of this project is to preserve and enhance the diversity of plant and animal communities on the S-CNF by reducing and limiting the spread of noxious weeds. Alternative 1 is consistent with this objective.

7. The Federal Land Policy Management Act of 1976 (PL-94-579)

This Act authorizes control of weeds on rangeland. Alternative 1 is consistent with this law.

8. Environmental Justice and Civil Rights

Executive Order 12898, issued in 1994, ordered Federal Agencies to identify and address any adverse human health and environmental effects of agency programs that disproportionately impact minority and low-income populations. The Civil Rights Act of 1964 provides for nondiscrimination in voting, public accommodations, public facilities, public education, Federally assisted programs, and equal employment opportunity. Title VI of the Act, Nondiscrimination in Federally Assisted Programs, as amended (42 U.S.C. 2000d through 2000d-6) prohibits discrimination based on race, color, or national origin.

As described in the FEIS Chapter 4, Alternative 1 would not alter subsistence rights and fishing by Native American Tribes, and would not disproportionately impact minority or low-income populations. Tribes holding treaty rights for hunting and fishing on the S-CNF are included on the project mailing list and provided comments on this project that were incorporated into the FEIS.

9. Clean Air Act

The basic framework for controlling air pollutants in the United States is the 1970 Clean Air Act, as amended in 1990 and 1999 (42 USC 7401 *et seq.*). The primary potential concern with this project in regard to air quality effects is with the ground-based application of herbicides. Since treatments will be conducted according to all applicable mitigation measures, BMPs, and SOPs and will be distributed across the S-CNF and over time, concentrations of air contaminants will not accumulate to the point of violating air quality standards for any area (FEIS 2003).

10. Migratory Bird Treaty Act

The mitigation measures, BMPs, and SOPs associated with Alternative 1 provide adequate conservation measures for the protection of migratory birds. Overall, potential impacts on land birds and waterfowl are expected to be negligible (FEIS 2003).

11. The National Historic Preservation Act of 1966

Alternative 1 offers the greatest recovery potential for currently infested historic landscapes while having a minimal effect on cultural and historic values. The S-CNF archaeologist will consult with the Idaho State Historic Preservation Office (SHPO) and the Shoshone-Bannock

Tribes prior to implementing Alternative 1. Alternative 1 will not adversely affect sites listed or eligible for the National Register of Historic Places.

12. Executive Order 13112, Invasive Species, February 3, 1999

Alternative 1 complies with this order directing federal agencies whose actions may affect the status of invasive species to prevent the introduction of invasive species; and detect and respond rapidly to, and control, populations of such species in a cost-effective and environmentally sound manner, as appropriations allow.

13. 36 Code Of Federal Regulations (CFR) Sub A, Sec 222.8

Alternative 1 complies with this direction: "...The Chief of the Forest Service will cooperate with County or other local weed control districts in analyzing noxious farm weed problems and developing control programs in areas which the National Forests and National Grasslands are a part."

14. Federal Noxious Weed Act of 1974 (Sec 9)

Alternative 1 complies with this authorization for the Secretary to cooperate with other federal and state agencies or political subdivisions thereof, and individuals in carrying out measures to eradicate, suppress, control, or prevent the spread of noxious weeds.

15. Public Law 90-583 (Carlson-Foley Act, October 17, 1968)

Cooperative agreements described in the FEIS are in compliance with this law that authorizes and directs heads of federal departments and agencies to permit control of noxious plants by state and local governments on a reimbursement basis in connection with similar and acceptable weed control programs being carried out on adjacent non-federal land.

IX. ENVIRONMENTALLY PREFERRED ALTERNATIVE

The Forest Service identified Alternative 2 as the Environmentally Preferred Alternative. This recognition is based on its lack of herbicide use and therefore lack of potential impacts to the environment. However, Alternative 2 is also recognized as being the least effective of the alternatives evaluated in controlling noxious and non-native invasive weeds, thus having the greatest long-term impacts to native plants, wildlife habitat, and ecosystem health. While Alternative 2 is environmentally preferred in the short-term, Alternative 1 is expected to result in the greatest environmental benefits with the least environmental risks over the long-term (FEIS pp 2-58 and 2-59).

X. IMPLEMENTATION DATE

This project is subject to administrative appeal and review. If no appeal is filed, 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 filed, implementation may not occur for 15 days following the date of appeal disposition.

XI. ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES

This decision is subject to appeal pursuant to 36 CFR 215, only by those individuals and organizations who provided comments or otherwise expressed interest during the 45-day comment period on the Draft EIS. The appeal must meet the requirements at 36 CFR 215.14. Incorporation of documents by reference is not allowed.

The Appeal Deciding Officer is Harv Forsgren, Regional Forester, Intermountain Region. Appeals filed by regular mail, fax or express delivery must be sent to:

Appeals Deciding Officer
USDA Forest Service, Intermountain Region
324 25th Street, Ogden UT 84401
Telephone (801) 625-5605
Fax (801) 625-5277

Appeals may be hand-delivered to the above address between the hours of 8:00 AM and 4:30 PM Mountain Time, Monday through Friday, excluding holidays.

Electronic appeals must be submitted in a rich text (.rtf) format or Microsoft Word (.doc) format as an email message to: appeals-intermtn-regional-office@fs.fed.us. E-mailed appeals must include the project name in the subject line. In cases where no identifiable name is attached to an electronic message, a verification of identiy will be required. A scanned signature is one way to provide verification.

Appeals, including attachments, must be filed within 45 days from the publication date of this notice in *The Recorder Herald*, the newspaper of record, Salmon, Idaho. Attachments received after the 45-day appeal period will not be considered. The publication date in *The Recorder Herald*, newspaper of record, is the exclusive means for calculating the time to file an appeal. Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source.

If no appeals are filed within the 45-day time period, implementation of the decision may occur on, but not before, 5 business days from the close of the appeal filing period. When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

XII. CONTACT PERSON

For further information on this project and implementation, contact Renee Snyder, Ecosystem Staff Officer at (208) 756-5290, or write to: Salmon-Challis National Forest, Supervisors Office, 1206 S. Challis St., Salmon, Idaho 83467.

Forest Supervisor, Salmon-Challis National Forest — 3/27/09 **Date**

REFERENCES

National Marine Fisheries Service 2007. Concurrence and Biological and Conference Opinions for the Noxious Weed Management Program on Lands Administered by the Salmon-Challis National Forest, Idaho. March 2007.

State of Idaho 2001. Executive Order No. 2001-11. Establishing the Idaho Invasive Species Council. September 26, 2001.

U.S. Forest Service, Salmon-Challis National Forest 2003a. Programmatic Biological Assessment of Effects of the Noxious Weed Management Program on Lands Administered by the Salmon-Challis National Forest on Federally Listed, Proposed, and Candidate Plant, Wildlife, and Fish Species and Critical Habitat. September 2003.

U.S. Forest Service, Salmon-Challis National Forest 2003b. Final Environmental Impact Statement, Salmon-Challis National Forest Noxious Weed Management Program. September 2003.

U.S. Forest Service, Salmon-Challis National Forest 2004. Decision Record and Finding of No Significant Impacts for the Proposed Amendments to the Management Indicator Species List for the Salmon and Challis Land and Resource Management Plans. November 2004

U.S. Fish and Wildlife Service 2004. Concurrence and Biological and Conference Opinions for the Noxious Weed Management Program on Lands Administered by the Salmon-Challis National Forest, Idaho. August 2004.