**United States Department of the Interior**
**Bureau of Land Management**
**Coeur d'Alene District, Idaho**

# FINDING OF NO SIGNIFICANT IMPACT

**Project Name**: Cottonwood Integrated Weed Treatment Program
**BLM Office**: Cottonwood Field Office, 1 Butte Drive, Cottonwood, Idaho 83522
**NEPA Register No.**: DOI-BLM-ID-C020-2011-0017-EA
**Project Location:** BLM lands located in Idaho, Adams, Latah, Clearwater, Nez Perce and Lewis Counties in the Cottonwood Field Office in Idaho;
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The Bureau of Land Management (BLM) prepared the attached environmental assessment (EA) for compliance with the National Environmental Policy Act (NEPA). Based upon my review of the EA, I have determined the proposed Cottonwood Integrated Weed Treatment Program, as described and analyzed as the Proposed Action alternative, is a not a major federal action that may have a significant effect on the quality of the human environment. As analyzed in the EA, no environmental effects of the proposed treatments meet the definition of significance as defined by regulations to implement NEPA found at 40 CFR 1508.27. This finding is based on my consideration of both the context and intensity of the project, as described below.

## Context

The Cottonwood Field Office (CFO) boundary encompasses over 8.8 million acres in Latah, Clearwater, Nez Perce, Lewis, Idaho, and Adams Counties of north-central Idaho. The BLM administers about 1.4 percent, or 132,526 acres of lands in the planning area. The CFO manages numerous blocks of BLM land ranging in size from less than 40 acres to over 12,000 acres. The CFO includes a wide variety of terrain and climatic conditions in three principle drainages, the Clearwater, Salmon, and Snake Rivers. The majority of BLM managed lands are located on the breaks of these rivers resulting in ownership of very steep and rocky topography.

The BLM proposes implementing an integrated weed treatment program on public lands in five cooperative weed management areas (WMA) organized within the CFO. The CFO coordinates with local county weed supervisors, state and federal agencies, private individuals and groups, and the Nez Perce Tribe to implement prioritized manual, biological and chemical control projects across boundaries. The program includes components of prevention, inventory, education, control, monitoring and revegetation. Control actions include the use of herbicides in accordance with approved procedures from the Record of Decision (ROD) for the *Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement*. Herbicide treatments would be limited to up to 800 acres per year or six tenths of one percent (0.6%) of the 132,526 acres of public lands managed by the CFO. In relation to the 8.8 million acres in the CFO area, herbicide use is being proposed by BLM on one, one-hundredth of one percent (0.01%) of the CFO area.

**Intensity**

***(1) Impacts that may be both beneficial and adverse.***

The EA analyzed impacts of the proposed action and alternatives on special designation areas (EA section 4.1), vegetation (4.2), water quality (4.3), fish (4.4), wildlife (4.5), soils (4.6), Native American Tribal uses (4.7), cultural resources (4.8) and human health (4.9).

The proposed action allows tools and strategies to positively impact special designation areas by protecting native vegetation which is a value for which many were established. Project design implements strategies to protect special status and sensitive resources in special use areas to avoid adverse impacts to those resources.

The strategies provide a wide range of tools to implement effective control of invasive plant species thereby providing beneficial impact to native plant species, and limit as much as possible the adverse impact of control methods to desired plant species occurring within project areas. The EA discloses that desired vegetation occurring within broadcast spray projects may be adversely impacted. The EA addresses the currently occurring adverse impacts of invasive plant species in the project area and how the elements of the proposal would seek to reduce those impacts.

The EA addressed the potential to affect water quality through unintentional introduction of herbicide ingredients into water during application or by treatments altering vegetation cover and resulting in changes to water quality parameters. Analysis determined that with implementation of project design features, standard operating procedures (SOPs) and mitigation measures, the opportunity for negative impacts were unlikely. Any potential for negative effects would be the result of a high intensity storm occurring directly after a larger herbicide application or an accidental spill whereby the impacts would be short-term. Positive impacts to water quality could occur through restoring native riparian vegetation and removal of invasive species impacting water quality parameters.

Potential impacts to fisheries from the proposed action and alternatives focus on aquatic and riparian habitat and are closely tied to water quality as described above. Analysis considered the potential for herbicide active ingredients to reach waters providing habitat, toxicology of herbicide active ingredients, as well as acreage of treatments likely to occur in any single drainage. The potential for negative effects to fisheries are the same scenarios mentioned in water quality of high intensity storms or accidents. Purposeful treatment of streamside vegetation may include short-term negative impacts due to reduction in streamside cover until native vegetation can recover. Positive impacts to fisheries also focus on habitat and include the restoration of riparian plant communities through reduction of invasive plants. Positive impacts to water quality include the reduction of the total acreage of upland native plant communities invaded by invasive plants and the restoration of native plant communities through removal of invasive species. These impacts would be seen in moving water quality parameters such as streamflow and sediment delivery toward historical levels.

In general, wildlife would be positively impacted by efforts to control invasive species and protect native vegetation which provide habitat. It is unlikely the proposed treatments would have direct adverse impact to most wildlife as a result of herbicide use. Most modeled exposure scenarios found no to low risk. There is a somewhat higher potential for adverse impact to individual amphibians or small sized birds and mammals that have small home ranges if broadcast herbicide treatment occurred over the entire habitat for that individual.

Invasive species negatively impact soils by altering nutrient cycling, water infiltration, soil erosion, and soil biota. The proposal to control invasive species would decrease these impacts. Direct impacts to soils as a result of the proposal would be short term and include disturbance of soils during implementation of manual and mechanical treatments and short-term introduction of herbicide to the soils substrate until degradation by soil microbes and other processes.

The EA discloses potential to adversely impact cultural resources mainly through the implementation of manual control treatments. Implementation of project design features, SOPs and mitigation measures adequately address these concerns.

***(2) The degree to which the proposed action affects public health or safety.***

As discussed in the EA section 4.9.1 (page 105-108), The proposed impact on public health or safety is addressed by disclosing risk to employees and the general public of being in an area where treatment occurred and consuming fruit contaminated by herbicide treatment over a period of time. Review of human health risk assessments and ecological risk assessments found no risk in most exposure scenarios and low risks due to acute accidental exposure through consumption of contaminated water from a spill and consumption of contaminated fish. These exposure scenarios are unlikely to occur as a result of the proposed treatments.

***(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.***

The proposed action is unlikely to impact unique characteristics of the geographic area. The analysis specifically addressed impacts of the action alternatives on cultural resources (4.8), wetlands and riparian areas and wildlife habitat (4.2.1 and 4.5.1), and special designation areas including wild and scenic rivers and Areas of Critical Ecological Concern (4.1). Potential impacts to special resources were adequately addressed through project design or implementation of SOPs and mitigation measures.

***(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.***

Public scoping indicated wide scale support for management and control of invasive plant species due to the impact they are having on native plant communities and resultant impacts on the natural environment. The Proposed Action and alternatives include a variety of management and control tools to address the impact of invasive plants. In general, public scoping indicates support for the use of all control tools. One comment letter expressed the desire that herbicides

not be used, another comment letter recognized that herbicide use may be a tool necessary to achieve objectives but requested aerial application of herbicides be minimized or excluded. The analysis explored numerous aspects of herbicide use of concern to members of the public and included alternatives excluding their use. Alternative 2 analyzed excluding aerial application of herbicides and Alternative 3 analyzed the effects of no herbicide or exotic biological control. Analysis of these alternatives allows comparison of how the lack of these application methods would impact the effectiveness of the proposed Cottonwood Integrated Weed Treatment Program. Some members of the public are not likely to agree with the use of herbicides under any circumstances even though analysis addresses relevant concerns. It is not expected that these concerns will be "highly controversial" because the proposed action and alternatives include a variety of project design features, SOPs and mitigation measures to avoid or reduce impacts to resources and elements of the human environment from herbicide use and the maximum treatment reflects the potential to treat one, one-hundredth of one percent (0.01%) of the CFO area.

***(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.***

The analysis addressed numerous potential scenarios that are unlikely in an attempt to adequately address uncertain risks. In many cases, adverse impacts noted are associated with these unlikely scenarios due to conservative environmental analysis. The impacts involved with invasive weeds and invasive weed management, including the use of herbicides, are well studied. It is unlikely that there are valid uncertain, unique or unknown risks associated with the proposal that were not addressed.

***(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.***

The proposal is for invasive plant management and control on BLM lands in the immediate future. It does not establish a precedent or represent a decision in principle about a future consideration as it does not preclude a change in management emphasis in the future.

***(7) Whether the action is related to other actions with individually insignificant, but cumulatively significant impacts.***

Cumulative effects of all alternatives on affected resources were addressed in chapter 4 of the EA. None were found to be significant.

***(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.***

The project proposal was analyzed for potential impacts to historic resources. The potential for damage to historic resources was noted in relation to manual control. This potential was adequately addressed through project design features requiring cultural surveys for any new planned project areas and adoption of SOPs.

***(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.***

The CFO prepared a biological assessment (BA) in accordance with ESA section 7 consultation requirements, and the sections in the EA on listed plant, fish and wildlife species summarize conclusions from the BA on all alternatives, including the Proposed Action alternative. The following species warrant discussion as to the degree of impact:

<u>ESA listed plants</u>

Invasive plant species are impacting the vigor and recruitment of plants listed under the Endangered Species Act (ESA) and the project proposes to control weeds within ESA plant populations through the use of herbicide, manual control and biological control. The analysis discloses not only the adverse impacts of uncontrolled spread and continued existence of invasive plant species on ESA listed plants, but the potential of adverse impacts to listed plant populations through treatment actions. Manual and herbicide treatment may negatively impact individual ESA listed plants so the proposal may and/or is likely to adversely impact individual plants and may result in the take of individual ESA listed plants. Reduction of invasive plants within an ESA plant population and the resultant reduction of competition for resources would positively benefit ESA listed plant populations. Project design features, mitigation measures, and SOP have been developed with input by the U. S. Fish and Wildlife Service (FWS) and consultation has been concluded with the FWS. The FWS service has requested BLM address invasive plant impacts within ESA listed plant populations and supports the treatment designs prescribed in the proposal for control of invasive plants within and around ESA listed plant populations as necessary to protect the species. The proposal supports FWS recovery plan measures to reduce weed threats within ESA listed plant populations of Spalding's catchfly and MacFarlane's four-o'clock.

<u>ESA listed Fish</u>

The proposal implements weed control actions in watersheds that provide habitat for ESA listed Snake River sockeye salmon, Snake River fall Chinook salmon, Snake River spring/summer Chinook salmon, steelhead trout, and bull trout and implements project design features, standard operating procedures and mitigation measures to protect the ESA listed fish species. The proposal was analyzed as to potential impacts to the species with particular consideration for the use of herbicides directly adjacent to aquatic habitats and the potential for sub-lethal effects. Some projects proposed in the action warrant a "no effect" determination, however, the proposal does contain a risk that herbicides may enter water providing habitat for ESA listed fish.

Out of 115 tributary stream segments (77 streams) providing habitat for ESA listed fish in the CFO management area where herbicide treatments may occur, three fish bearing tributaries have proposed chemical treatments that would exceed five acres in riparian conservation areas or exceed more than one acre of spot spraying within 100 feet of the stream. These streams were rated as having relatively more risk for the potential delivery of herbicide to aquatic habitats that

could contribute to sub-lethal effects. The levels of herbicide in water would still be expected to be below levels of concern. Herbicide application in the other tributaries were considered to have negligible risks of adverse effects to listed species or habitats when considering mortality to fish, sub-lethal effects and negative impacts to habitat.

The potential for direct delivery of herbicides to aquatic habitat through accidental spill or a high intensity thunderstorm immediately after herbicide application is low. These scenarios are a byproduct of the proposal and not a likely event.

The analysis supports that there is a low degree of potential for negative impact to ESA listed fish species and habitats. The BLM made a "may affect, likely to adversely affect" determination for Snake River spring/summer Chinook salmon, Snake River fall Chinook salmon, steelhead trout, and bull trout in relation to the proposal. The BLM made a "may affect, not likely to adversely affect" determination for sockeye salmon. The BLM has concluded consultation with the NMFS and FWS concerning these species, receiving biological opinions and concurrence from both agencies concluding that the action is not likely to jeopardize the continued existence of these species and is not likely to result in the adverse modification or destruction of designated critical habitat for these species. The BLM also adopted terms and conditions contained in the biological opinions as a part of the proposed action.

***(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.***

Implementation of the proposal is in compliance with applicable Federal, State, and local laws and requirements imposed for the protection of the environment.

**Conclusion**

> Based upon review of the EA, I have determined that the Cottonwood Integrated Weed Treatment Program will not have a significant effect on the quality of the human environment. Therefore, preparation of an environmental impact statement is not required.

__/s/ Will Runnoe_____ _12/06/2012

Will Runnoe, Field Manager Date