

U.S. Department of the Interior  
Bureau of Land Management  
Cottonwood Field Office

**DECISION RECORD**

**Project Name:** Cottonwood Integrated Weed Treatment Program

**Office:** Cottonwood Field Office, Idaho

**Subject Code:** 9015

**NEPA Register No.:** DOI-BLM-ID-C020-2011-0017-EA

**Location:** Idaho, Latah, Adams, Clearwater, Lewis, and Nez Perce Counties, Idaho

**Geographic Area:** North Central Idaho

**Legal Description:** Field Office Wide

**Contact:** Lynn Danly; Natural Resource Specialist, Telephone: 208-962-3797; e-mail:  
ldanly@blm.gov

**Proposed Action and the Purpose and Need**

The Bureau of Land Management (BLM), Cottonwood Field Office (CFO), is proposing to update and continue implementation of an integrated weed management program on public lands in north-central Idaho to control the expansion of noxious weeds and invasive species.

The actions analyzed in this Environmental Assessment (EA) are chemical, manual and biological weed control treatments proposed for implementation as part of an integrated weed management (IWM) program on lands managed by the CFO.

The action is needed because of proliferation of the current invasive species in the field office, the expansion of the state noxious weed list from thirty-six to sixty-four species, emphasis by local publics and cooperators to coordinate in weed management through Weed Management Areas, a new land use planning document, and changes in available tools to control weeds. The Cottonwood Resource Management Plan (CRMP) identifies a goal to “Prevent establishment of new invasive plant species and reduce infested acreage of established invasive plant species.” New tools and updated protocols are available for use on public lands as described in the “Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement 2007 (PEIS) and Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report, 2007.

**Compliance with the National Environmental Policy Act**

In accordance with regulations to implement the procedural requirements of the NEPA found at 40 CFR Parts 1500-1508 and 43 CFR Part 46, the BLM has reviewed the proposed action in the Cottonwood Integrated Weed Treatment Program. BLM’s review determined that the proposed action, as described, would not result in any significant impact that would require preparation of an EIS prior to approving this project for implementation as determined by completion of a Finding of No Significant Impact (FONSI) for the EA.

## **Public Involvement**

The public was initially notified of the project through posting on the BLMs NEPA planning database on November 17, 2008 and through a mailing to interested publics and the Nez Perce Tribe of a scoping/information package detailing the proposed action and preliminary alternatives for the proposal on December 30, 2008. The BLM received five comment letters from the public on the proposal.

### **Wallowa Resources (WR)**

Wallowa Resources supports the Proposed Action and does not support alternatives that preclude the use of herbicide, biological control or aerial treatment due to ineffective control of invasive weeds. They support an IWM program with herbicide, biological control and aerial application as a necessary tool in rugged topography. They support coordinated weed management with partners.

### **Idaho Conservation League (ICL)**

ICL supports a region-wide program for management of noxious weeds and recognizes the need to prevent or control their spread. ICL suggests BLM focus on prevention of weed spread during management activities and land uses (grazing, OHV, roads/travel management, timber management), suggests BLM monitor herbicide applications for drift, suggests BLM consider alternatives to herbicide treatments such as grazing, fire use, and mechanical treatment, and supports the judicious use of herbicides where safe and appropriate through ground based methods. Concerns include effects of herbicides in aquatic environments and impacts to amphibians, safety of aerial application in relation to potential drift and aquatic resources, and use of herbicides to control native plants (specific to undesirable plant control in commercial timber stands).

### **Friends of the Clearwater and Alliance for the Wild Rockies (FOC)**

FOC suggests BLM focus on prevention of weeds and suggests prevention practices, use of volunteers, mechanical treatments as well as experiments to increase the palatability of weeds to livestock and wildlife. FOC suggests BLM look at all components of an integrated program, analyze an adequate range of alternatives which include no herbicide or exotic biological control and monitor control efforts. Concerns include impacts of herbicides in relation to; aquatic resources such as salmon, steelhead, bull trout and amphibians, traditional tribal gathering areas, native plants, and humans. Concerns also include bio-accumulation and herbicide resistance.

### **Idaho County Weed Control (IC)**

IC supports the proposed action and BLM should include the use of all tools available; specifically prevention, inventory, herbicide application, and bio-control. Idaho County supports the use of aerial application as a tool and BLM's continued participation as a partner in cooperative weed management areas.

## Adams County Weed Control (AC)

AC supports BLM's participation in cooperative efforts and inventory and control of weeds in Adams County.

Due to the length of time that had passed since the initial scoping was conducted, BLM re-posted the project through the BLM e-Planning NEPA Register, and no public scoping comments were received.

The National Marine Fisheries Service (NMFS) and Fish and Wildlife Service (FWS) were consulted on the project and provided input on the development of the proposed action. A biological assessment was submitted for their review on December 12, 2011 resulting in receipt of a biological opinion from FWS dated May 25, 2012 and a biological opinion from NMFS dated November 20, 2012. Both biological opinions contained terms and conditions for protection of endangered species that are adopted as a component of this project.

The EA was posted for a 30 day review on February 2, 2012 and notification of its availability sent to parties that submitted comments during the public scoping period on 1/26/2012.

The EA and FONSI documents will be available with this Decision Record during a 30-day administrative review period on the Idaho BLM NEPA website at:

[https://www.blm.gov/epl-front-office/eplanning/nepa/nepa\\_register.do](https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do)

## **DECISION**

It is my decision to implement the Cottonwood Integrated Weed Treatment Program as described in the Proposed Action.

The Proposed Action enumerates the basic integrated weed treatment components of prevention, inventory, education, control, monitoring and revegetation which will be employed in the CFO along with a prioritization strategy for weed treatment efforts that make the most efficient use of limited time and resources. Ten herbicide active ingredients are included for use in the Proposed Action that will provide a good range of herbicide tools to impact target invasive weeds in the CFO. The Proposed Action includes the adoption of standard operating procedures and mitigation measures delineated in the 2007 PEIS Record of Decision as well as numerous design features to assure the protection of sensitive resources (pages 14 – 15 of the EA). Herbicide application methods include ground based techniques as well as aerial application methods. Additional invasive plant control methods included in the Proposed Action are the use of manual and biological control.

CFO will incorporate measures to protect ESA listed fish, plants and their habitat as required in the Biological Opinions for this project.

Records of herbicide application, biocontrol release, post herbicide treatment monitoring, and monitoring of biocontrol releases will be accomplished as described on page 9 of the EA. Various reports and reviews will be made available as requested. A mid-season status report will be provided to NMFS by July 31, each year summarizing the acreage treated for each herbicide applied within 100 feet of streams. Herbicide records will be available for review by NMFS by December 31 each year. A final report will be submitted to NMFS by March 15, each year. An annual report will be submitted to FWS by April 1, each year detailing acres treated within 100 feet of streams containing bull trout habitat, herbicides used, location of treatments sites and monitoring results.

### **Rationale**

Cottonwood Integrated Weed Treatment Program is in conformance with the Cottonwood Resource Management Plan (December 2009) and provides a mechanism to implement specific actions to achieve Goal VW-1, *Prevent establishment of new invasive plant species and reduce infested acreage of established invasive plant species*. It also provides a tool to address other goals in the plan relating to maintaining native plant communities, improving degraded riparian and wetland vegetation, improving diversity of habitat for wildlife, and support recovery of plant species listed under the Endangered Species Act. The project is consistent with other Federal, State, and local laws, regulations, or requirements imposed for protection of the environment.

The various alternatives in the EA reflected a variety of programs to address an integrated weed treatment program including those suggested by the public during scoping. Alternatives considered not allowing the use of herbicides, biological controls, or aerial application of herbicides. Analysis presented for each alternative allowed me to see the effectiveness of the described treatment program in protecting our valuable remaining native plant communities and weigh the various impacts of the treatments on considered resources. The analysis describes the risk to native plant communities from increased weed spread in the absence of herbicide use and aerial application. Analysis for aquatic species displays the potential risk of utilizing herbicides both with inclusion of aerial application as a tool and without. Allowing the use of aerial application as described in the Proposed Action did not appreciably change the impact analysis for aquatic resources. Knowing the inaccessible areas of the CFO planning area where weeds occur, or may occur in the future, I recognize we may not be able to effectively control weed spread and resultant negative impacts to our in-tact native plant communities without aerial application as an available tool. There could be substantial negative impacts to native plant communities resulting from a decision to not utilize this application method. The standard operating procedures, buffers to protect sensitive resources, and other protective measures detailed in the Proposed Action to be employed during aerial application reduce the potential impacts of the application method to a level where the treatment effectiveness outweighs the minimal potential risk.

## **Decision Date**

As the BLM Authorized Officer, I approve the action effective immediately.

/s/ Will Runnoe  
Will Runnoe, Field Manager

12/06/2012  
Date

## **Administrative Review Procedures**

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Public notification of this decision will be considered to have occurred on the date this decision is available for administrative review from the Idaho BLM NEPA website. Within 30 days of this decision, a notice of appeal must be filed in the office of the Authorized Officer, Will Runnoe, at the BLM Cottonwood Field Office, 1 Butte Drive, Cottonwood, Idaho 83522. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals (IBLA), Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the Authorized Officer.

If you wish to file a petition for stay pursuant to 43 CFR Part 4.21(b), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,
3. The likelihood of irreparable harm to the appellant or resources if the stay is not granted, and
4. Whether the public interest favors granting the stay.

If a petition for stay is submitted with the notice of appeal, a copy of the notice of appeal and petition for stay must be served on each party named in the decision from which the appeal is taken, and with the IBLA at the same time it is filed with the Authorized Officer.

A copy of the notice of appeal, any statement of reasons, and all pertinent documents must be served on each adverse party named in the decision from which the appeal is taken, and on the Office of the Solicitor, U.S. Department of the Interior, 960 Broadway Avenue, Suite 400, Boise, Idaho 83706, not later than 15 days after filing the document with the Authorized Officer and/or IBLA.