

**United States Department of the Interior  
Bureau of Land Management**

---

**Decision Record**

**Programmatic Noxious Weed and Invasive Plant Management  
Grand Staircase-Escalante National Monument  
Environmental Assessment  
NEPA No. DOI-BLM-0300-2011-0009-EA**

---

**August 29, 2015**

***Location:*** Grand Staircase-Escalante National Monument (GSENM) is located in south-central Utah. GSENM includes approximately 1.9 million acres of public land in Kane and Garfield Counties.

Grand Staircase-Escalante National Monument  
669 South Highway 89A  
Kanab, UT 84741  
Phone: (435) 644-1200  
Fax: (435) 644-1250



## **DECISION RECORD**

### **Programmatic Noxious Weed and Invasive Plant Management Grand Staircase-Escalante National Monument Environmental Assessment NEPA No. DOI-BLM-0300-2011-0009-EA**

#### **I. DECISION**

I have decided to select Alternative A, the proposed action, for implementation as described in the Programmatic Noxious Weed and Invasive Plant Management Environmental Assessment (EA; NEPA No. DOI-BLM-0300-2011-0009). Based on my review of the EA and project record, I have concluded that the proposed action was analyzed in sufficient detail to allow me to make an informed decision. I have selected this alternative because the proposed treatments will improve overall native vegetation communities by using improved methods of noxious and non-native invasive plant treatments. Four new herbicides will be allowed to treat such species as downy brome and aquatic species that previously could not be treated. With the inclusion of treating non-native invasive species, new invading species can be treated using a variety of methods before they become established.

My decision includes Appendix B of the EA; Prevention Measures, Standard Operating Procedures, Mitigation Measures, Treatment Standard Operating Procedures, Mitigation Measures, and Conservation Measures for Plants, Conservation Measures for Aquatic Animals, and Conservation Measures for Terrestrial Animals and Appendix D of the EA, which lists the monitoring methods specific to the Escalante River Restoration Project in riparian areas.

#### **II. CONFORMANCE AND COMPLIANCE**

The authority for my decision is contained in several Federal laws that direct the BLM to manage noxious weeds, invasive plants, and other vegetation to improve ecosystem health.

The *Federal Land Policy and Management Act (1976)* (FLPMA) directs the BLM to manage public lands “in a manner that will protect the quality of scientific, scenic, historic, ecological, environmental, air and atmospheric, water resources and archeological values” and to “take any action necessary to prevent unnecessary and undue degradation of public land.”

In February 1999, the President issued *Executive Order 13112* on invasive species. This Executive Order requires Federal Agencies “...to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause.”

My decision is in conformance with the Monument Management Plan (BLM 2000). The MMP includes a goal for vegetation that indicates "... the Monument will be managed to achieve a natural range of native plant associations." To help achieve this goal, the MMP notes that "A variety of vegetation restoration methods may be used to restore and promote a natural range of native plant associations in the Monument." The MMP includes the following plan decisions related specifically to noxious weed control:

NW-1 - The BLM will control noxious weeds in accordance with National and State policies and directives. Control of noxious weeds is also a priority to achieve the overall vegetation objectives stated.

NW-2 -Projects will be designed in conjunction with Kane and Garfield Counties and adjacent U.S. Forest Service and National Park Service Staffs. With this strategy the BLM hopes to control noxious weed species and prevent introduction of new invasive species into the Monument and surrounding ecosystems.

NW-3 - An array of methods will be used as appropriate for the control of specific noxious weed species. These methods include: the use of chemicals (aerial spraying, hand spraying, and painting), hand cutting, biological control agents, and manual pulling. Each of these methods has a place in the control of these invasive species and will be evaluated for their effectiveness as eradication projects are designed.

NW-4 - BLM employees or contractors with appropriate certification will be responsible for the use of these chemicals and will take precautions to prevent possible effects to non-target plant species.

NW-5 - Aerial chemical applications may only be used in limited circumstances where:

- accessibility is so restricted that no other alternative means is available,
- it can be demonstrated that non-target sensitive species or other Monument resources will not be detrimentally affected, and
- Noxious weeds are presenting a significant threat to Monument resources.

NW-6 - The noxious weed control program will target species in a prioritized manner. Priorities for weed control may include: invasiveness of the species, extent of invasion, sensitivity of the area being invaded, and accessibility. Areas with special status species habitat will have a priority for weed removal. Project level environmental assessments or other NEPA analysis will be completed prior to noxious weed removal project initiation.

NW-7 - In addition to strategies for control of established noxious weeds, it is also imperative to reduce the introduction of noxious weed species as stated in Presidential Executive Order (EO 11312) on invasive species. Cooperative programs established for control of these species will also help identify potential new invasions before area-wide establishment has occurred. There are two policies which will help to reduce potential noxious weed introduction.

- First, the BLM requires all hay used on BLM lands be certified weed free. This is a statewide policy which applies to the Monument, as well as all other BLM lands in the State of Utah.
- Second is the requirement that all machinery that has been outside the Monument be cleaned prior to use on the Monument. This provision generally applies to contract equipment used for projects such as construction of facilities and firefighting equipment. Both of these provisions will help reduce the introduction and spread of noxious weed species in the Monument.

NW-8 - For major removal projects, monitoring plots will be established in key areas to determine effectiveness of methods and presence of noxious weed species. All projects will contain restoration and /or revegetation protocols to minimize re-colonization of treated areas by noxious weed species. Monitoring in these areas will be part of the adaptive management framework described in Chapter 3.

In addition to the specific decisions listed above, the MMP also includes numerous other decisions that encourage or target control of noxious weeds and invasive species and the type of actions that may be taken. Some of these other decisions include:

RM-4 – Chemical methods will generally be restricted to the control of noxious weed species, and are discussed in that section. The use of chemicals may also be allowed in conjunction with research projects and must lead to the achievement of the overall vegetation objectives. These activities will be approved as determined appropriate through consultation with the GSENM Advisory Committee.

NAT-1 – In keeping with the overall vegetation objectives and the Presidential EO13112, native plants will be used as a priority for all projects in the Monument

NAT – 2 – Non-native plants may be used in limited, emergency situations where they may be necessary in order to protect Monument resources by stabilizing soils and displacing noxious weeds. This use will be allowed to the extent that it complies with the vegetation objectives, Presidential. EO13112, and the *Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah* (1997). In these situations, short-lived species (i.e., nurse crop species) will be used and will be combined with native species to facilitate the ultimate establishment of native species.

VEG-1 - The BLM will place a priority on the control of noxious weed species and prevent the introduction of new invasive species in conjunction with Kane and Garfield Counties and the adjacent U.S. Forest Service and National Park Service units.

RIPA-6 - The noxious weed control program will target invasive species such as tamarisk and Russian olive, which will improve riparian functioning condition.

REV-1- Many factors will be considered when deciding to implement a revegetation or restoration strategy. Each project and area to be treated will be evaluated to determine the appropriate strategy. The following general guidelines can be applied to determine which

strategy is the most appropriate and how it will be implemented in order to be consistent with the overall vegetation management objectives.

- Restoration will be the goal whenever possible (i.e., an attempt will be made to return disturbed areas to conditions which promote a natural array of native plant and animal associations).
- Species used in both restoration and revegetation projects will comply with the non-native plant policy described above (i.e., native plants will be used as a priority).
- Revegetation strategies will be used in areas of heavy visitation, where site stabilization is desired.
- Restoration provisions will be included in all surface disturbing projects including provisions for post restoration monitoring of the area. Costs for these activities will be included in the overall cost of the project and will come out of the entire project budget.
- Priority for restoration or revegetation will be given to projects where Monument resources are being damaged. These sites will likely be in areas near development and/or heavy visitor use. Although these areas are more likely to be candidates for revegetation projects, careful evaluation of disturbed sites needs to be conducted to include desired future condition of an area. Restoration or revegetation of areas receiving heavy use may include limits on visitor use in order to promote recovery.

### **III. FINDING OF NO SIGNIFICANT IMPACT**

I have reviewed the direct, indirect, and cumulative effects of the proposed activities documented in the EA for the Programmatic Noxious Weed and Invasive Plant Management Environmental Assessment. I have also reviewed the Finding of No Significant Impact (FONSI) and the project record for this analysis. I have determined that the action is not a major federal action and will not significantly affect the quality of the human environment. I considered the impacts of this action both individually and cumulatively with other actions in the general area. No environmental impacts meet the definition of significance in context or intensity as defined in 40 CFR 1508.27. The environmental impacts of this project, individually and cumulatively do not exceed those impacts described in the GSENM MMP/FEIS (BLM 2000), the "Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States: Programmatic Environmental Impact Statement (Final)" (BLM 2007a; hereinafter "PEIS") and the "Record of Decision: Vegetation Treatments on Bureau of Land Management Lands in 17 Western States" (BLM 2007c; hereinafter "ROD"). Therefore, an environmental impact statement is not needed.

### **IV. OTHER ALTERNATIVES CONSIDERED**

The BLM evaluated three alternative in this EA .Chapter two of the EA describes Alternative A (Proposed Action, p.21), Alternative B (No Action p.29), and Alternative C (No Herbicide, p. 32). Other alternative were considered but not brought forward for analysis (p.36).

Alternative A proposed to manage noxious weeds and non-native invasive plants using an integrated weed management approach, utilizing a combination of manual, mechanical, biological, chemical, and debris management methods. The following 18 herbicide active ingredients approved for use in the 2007 Record of Decision would be available for use on GSENM : 2,4-D, bromacil, chlorsulfuron, clopyralid, dicamba, diuron, glyphosate, hexazinone, imazapyr, metsulfuron methyl, picloram, sulfometuron methyl, tebuthiuron, triclopyr, imazapic, diquat, diflufenzopyr (in formulation with dicamba), and fluridone.

Integrated weed management requires an ecologically based, interdisciplinary approach. Selection of treatment methods is based on information such as the biology of particular noxious weed or invasive plant, site location, proximity to water, and size of the infestation. Multiple treatments may be required to treat the noxious weeds or invasive plants and meet the objectives for each treatment area. Treatments may be repeated on an annual basis; any herbicide application will follow label specifications. Similarly, herbicide used at a treatment area may change over time as the presence of noxious weeds or invasive plants and/or site conditions change and to avoid chemical resistance. Up to 4,800 acres would be treated each year under this alternative; the actual acreage of treatments may be more or less and will depend on annual funding.

Alternative A, is the environmentally preferable alternative in this Decision Record. This alternative best meets the purpose and need for the proposed action. This alternative allows the BLM to use a total of 18 herbicides. The purposes of the proposed action are to provide BLM personnel with the herbicides and methods available for non-native vegetation treatments on public lands and to describe the conditions and limitations that apply to their use. The need for the proposed action is to improve ecosystem health by manipulating vegetation to enhance native plant communities, improve riparian and wetland areas and improve water quality.

The BLM determined that the risks associated with the use of herbicides under this alternative will be minor, and the benefits of herbicide use will be greater than with the other alternative; therefore, the BLM identified this alternative as the environmentally preferred alternative.

Alternative B proposed to continue herbicide use and other treatment methods authorized in the 1998 Noxious Weed Control Environmental Assessment for the Cedar City District, Escalante Resource Area. This area included lands within Grand Staircase Escalante National Monument. Under this alternative, the BLM would continue use of the active ingredients previously approved under the Final EIS for Vegetation Treatments on BLM Lands in Thirteen Western States (BLM 1991), with the exception of the six herbicide active ingredients (2,4-DP, asulam, atrazine, fosamine, mefluidide, and simazine) that were not approved for use in the 2007 ROD (BLM 2007c). The four new herbicides (imazapic, diquat, diflufenzopyr (in formulation with dicamba), and fluridone approved in the 2007 ROD (BLM 2007c) would also not be used under this alternative. Up to 1,150 acres would be treated by chemical each year, and up to 1,450 acres would be mechanically/manually treated; the actual acreage of treatments may be more or less and will depend on annual funding levels.

Records of Decisions prepared in the late 1980s and early 1990s collectively allowed the BLM to use a total of 20 herbicides active ingredients, these ingredients were approved under the 1998 EA. The previous EA did not allow the BLM to use herbicides on species other than those listed on the Utah State Noxious Weed list. The previous EA also did not approve herbicides that are effective in the control of giant salvinia, milfoils, and downy brome. Earlier Records of Decision for Environmental Impact Analysis that the 1998 EA tiered to provided SOPs and mitigation measure, but the level of protection afforded by these measures was determined to be less than protection provided under the 2007 Vegetation Treatments Using Herbicides on Bureau of Land Management lands in 17 Western States: Programmatic Environmental Impact statement (Final). For these reasons BLM did not select this alternative for the Decision.

Alternative C proposed to not be able to treat vegetation using herbicides. The BLM would be able to treat vegetation using fire, mechanical, manual, and biological control methods to manage noxious weeds and invasive plants using an integrated weed management approach. On average 500 acres or less would be treated each year.

Although there would be no risks to humans and the environment from herbicides under this alternative, the risk of environmental damage from the spread of weeds and other non-native vegetation, and increased risk of wildfire especially due to downy brome, would be greater under this alternative than the other action alternative. For these reasons, the BLM did not select this alternative for the Decision and did not consider this alternative to be the environmentally preferred alternative.

## **V. RATIONALE FOR DECISION**

Alternative A, the proposed action, was chosen because it best enables GSENM to implement an integrated weed management program that utilizes methodologies and materials available to control, contain, and/or eradicate noxious weeds and invasive plants (i.e., mechanical, manual, biological, chemical, and fire).

The Noxious Weed and Invasive Plant Management Plan (IWM Plan) described in Alternative A is based on integrated weed and pest management principles that address the introduction and spread of invasive plants and noxious weeds, specifically state listed noxious weeds, existing non-native invasive species, and potential new non-native invaders. In addition, the selection of Alternative A will allow the BLM to work more efficiently using integrated pest management techniques to prevent, control, and eradicate weed species and will allow the use of BLM-approved herbicides.

## **IV. PUBLIC INVOLVEMENT**

A scoping letter was sent out to the public and post on ENBB on April 9, 2012. Eight letters were received; these comments and BLM response are included in the EA. The Environment Analysis was posted on ePlanning on July 10, 2015 and six letters were sent to interested parties. No responses or comments were received.

## V. APPEALS

This decision may be appealed to the Interior Board of Land Appeals (IBLA), Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Any appeal must be filed within 30 days of this decision. Any notice of appeal must be filed with Cynthia Staszak, the Monument Manager; 669 South Highway 89A, Kanab, Utah 84741. The appellant shall serve a copy of the notice of appeal and any statement of reasons, written arguments, or briefs on each adverse party named in the decision, not later than 15 days after filing such document (see 43 CFR 4.413(a)). Failure to serve within the time required will subject the appeal to summary dismissal (see 43 CFR 4.413(b)). If a statement of reasons for the appeal is not included with the notice, it must be filed with the IBLA, Office of Hearings and Appeals, U. S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 by September 29, 2015, (within 30 days) after the notice of appeal is filed with Cynthia Staszak, Manager for Grand Staircase Escalante National Monument.

Notwithstanding the provisions of 43 CFR 4.21(a)(1), filing a notice of appeal under 43 CFR Part 4 does not automatically suspend the effect of the decision. If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal.

A petition for a stay is required to 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 immediate and irreparable harm if the stay is not granted; and
- (4) Whether the public interest favors granting the stay.

In the event a request for stay or an appeal is filed, the person/party requesting the stay or filing the appeal must serve a copy of the appeal on the Regional Solicitor's Office, Wallace F. Bennett Federal Building, 125 South State Street Mailstop 201, Salt Lake City, UT 84138.

  
Cynthia Staszak  
Monument Manager  
Grand Staircase-Escalante National Monument

8-29-15  
Date