USDA United States Department of Agriculture | Forest Service | Monongahela National Forest | 200 Sycamore Street Elkins, WV 26241 304-636-1800

File Code: 2080/1950-1
Date: April 10, 2008

Re: Scoping - Opportunity to Comment on the Proposed Monongahela Forest-wide Nonnative Invasive Plant Management Project

Dear Friends and Neighbors of the Monongahela National Forest:

The Monongahela National Forest is proposing to implement management actions for non-native invasive plant species (NNIS) across the Forest over the next ten years.

Please take a few minutes to review the following information and provide your comments about proposed activities.

Your comments will be used to identify relevant issues. They will help guide the environmental analysis and documentation. Please be as specific as possible when responding. If you provide data or research results, please identify why the information is pertinent to the Monongahela Forest-Wide Non-Native Invasive Plant Management Project and provide a copy of the information.

For additional information about this project, or to provide comments, please contact Kent Karriker, the Team Leader for the project. You can reach him at Monongahela National Forest, 200 Sycamore Street, Elkins, West Virginia, 26241; or by phone at 304-636-1800, extension 169. You may also email comments to comments-eastern-monongahela@fs.fed.us. Please include the phrase "non-native invasive plants" in the subject line of the e-mail.

To best use your comments, please provide them within 30 days of the date of this letter. If you do not wish to comment at this time, but would like to continue receiving information about this project, please let us know. Additional information about this project will be mailed to those people who have submitted comments during the analysis process and to those who request additional information.

Also let us know what format you prefer for receiving information: hard copy; e-mail; or CD. It is the responsibility of interested parties to respond to this notice within the established time period. No means of communication is perfect. Please contact our 'for additional information' address above if a document is not available or delivered at the expected time, to ascertain its availability, and if necessary, to arrange an alternate delivery method.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action and will be

available for public inspection. Comments submitted only anonymously will be accepted and considered; however, those who submit anonymous comments may not have standing to appeal the subsequent decision under 36 CFR Part 215.

Overview

The Monongahela National Forest proposes to implement vegetation management and associated activities across the Forest over the next ten years to help meet direction in the Monongahela National Forest Land and Resource Management Plan (Forest Plan, USDA Forest Service 2006, available on the internet at http://www.fs.fed.us/r9/mnf/plan_revision/Information/information.htm#anchor3). The projects and activities described below form the initial Proposed Action. The Forest will prepare an Environmental Assessment to disclose the direct, indirect, and cumulative effects of the Proposed Action, the No Action Alternative, and any alternatives that may be developed in response to public or internal issues. Because the project includes activities at a variety of locations across the Forest, it was not practical to include site-specific details of the proposed activities with this letter. Maps and tables describing the site-specific locations and activities are available on the internet at http://www.fs.fed.us/r9/mnf/environmental/proposed_projects/proposed_index.htm. Site-specific information can also be obtained by contacting the Team Leader.

Location

The proposed actions are all located on National Forest System lands within the proclamation and purchase unit boundary of the Monongahela National Forest, which is located in Preston, Tucker, Grant, Barbour, Randolph, Pendleton, Pocahontas, Greenbrier, Nicholas, and Webster counties, West Virginia. The Forest includes land in the drainage basins of the Cheat, Elk, Gauley, Greenbrier, Potomac, and Tygart Valley rivers.

Forest Plan Direction

Land within the Forest is allocated to several management prescriptions with management emphases ranging from timber production and age class diversity to wilderness. Management direction for non-native invasive species is contained within Forest-wide direction, which applies to all management prescriptions.

Desired Conditions: The Forest-wide integrated desired conditions include the following statement: "[e]xisting non-native invasive species populations are not expanding and new invader species are not becoming established" (Forest plan, p. II-6). Forest-wide desired conditions for vegetation emphasize prevention by calling for an early detection/rapid response strategy for dealing with new invasive plant occurrences, and also by emphasizing the use of non-invasive species for revegetation efforts. Desired conditions address treatment by encouraging prioritization of existing infestations for treatment based on threats to specific resources and the ability to achieve control (Forest Plan, pp. II-17 and II-18).

Management Direction: Forest-wide goals, standards and guidelines for NNIS give specific direction for achieving desired conditions (Forest Plan, pp. II-19 through II-20). This direction emphasizes prevention, coordination with state and other federal agencies, prioritized treatment of infestations, inventory, and monitoring.

Background

Non-native invasive plants continue to spread on the Forest. Several rare plant communities are imminently threatened by expanding infestations. Many other important ecosystems and large areas of contiguous federal ownership remain largely uninvaded, but threats to these ecosystems are increasing due to new spot infestations and continued spread along transportation corridors or other pathways. Control of invasive species continues to be a national and regional priority.

The Forest currently pursues several prevention and treatment strategies for NNIS. They include a) public outreach, b) use of straw rather than hay for mulch, c) required cleaning of logging equipment prior to use on National Forest lands, d) prevention measures applied to maintenance activities, e) monitoring, f) use of weed-free seed, g) inclusion of prevention measures in special use permits, and h) borrow pit inspections.

Purpose of and Need for Action

The purpose of this project is to limit, or where feasible, eliminate, the adverse effects of NNIS plants on ecosystems and other resources. This purpose is in accordance with desired conditions, goals, standards, and guidelines in the Forest Plan, as outlined above. Specific needs that have been identified are listed below:

- Reduce the risk of NNIS plant introduction into currently uninfested areas.
- Control NNIS plants that threaten rare communities and high-interest ecosystems such as botanical areas, candidate research natural areas, National Natural Landmarks, and habitat for threatened, endangered, or sensitive (TES) species.
- Control NNIS plants that threaten ecosystem integrity in landscape-scale ecological reserves (wilderness areas, remote backcountry, etc.).
- Eliminate emerging infestations of NNIS with the potential to develop into ecosystem-damaging infestations.
- Control NNIS plants that are impeding crop tree regeneration or damaging wildlife habitat improvements.
- Control NNIS plants that cause management problems for roads and facilities.

Proposed Action

The proposed action is an integrated, Forest-wide management strategy for NNIS plants. This action consists of two major components: preventing the spread of NNIS plants into new areas, and treating existing infestations. Although components of both prevention and treatment are included in many of the proposed activities, the activities have been categorized below according to the major emphasis.

The proposed action is both programmatic and site-specific. It is programmatic in that it establishes basic protocols for prevention and control of several high priority species in typical situations. It is also site-specific in that it identifies a limited set of high priority sites where specific prevention and control measures would be implemented.

Total eradication of all NNIS is considered impractical due to the widespread nature of some NNIS, the large number of species involved, multiple locations, the difficulty of obtaining a complete inventory, lack of acceptable control methods for certain species and habitats, potential effects on desirable species, the likelihood of reinvasion in disturbed habitats, and the prohibitive amount of labor and money that likely would be required. Therefore, consistent with Forest Plan direction, proposed activities have been prioritized to focus on protection of high-interest ecosystems and resources, and on plant species that pose the greatest risk and for which control efforts have a reasonable chance of succeeding.

Prevention

Trailhead Sanitation – Selected trails and trailheads that provide access to sensitive ecosystems and major backcountry areas would be monitored at least once every three years, especially near parking areas, to detect new NNIS infestations. If NNIS with the potential to cause ecosystem disruption or damage to facilities (high priority NNIS) appear, they would be controlled using one of the treatment methods outlined in the Treatment section below.

Invasion Pathways – Selected roads that provide potential invasion pathways into sensitive ecosystems would be placed into storage. Proposed road storage would involve 12 roads (including four non-system roads) totaling approximately 18 miles (see map for Cheat Mountain area at http://www.fs.fed.us/r9/mnf/environmental/proposed_projects/proposed_index.htm). None of the roads proposed for storage are currently open to the public. Because the road prisms would remain intact, stored roads could be re-opened if they are needed for future management access.

Treatment

Treatment would focus on NNIS that pose a direct threat to ecosystems and resources of interest. Many of the species proposed for treatment spread aggressively, are shade-tolerant, or both. These species pose particular risks to forested ecosystems or to unique communities such as limestone glades or wetlands. These species are proposed for control at sites where they threaten critical resources or where they are believed to be small, emerging infestations that can be eliminated before they get out of hand.

The treatment component of the proposed action includes the establishment of programmatic protocols for treatment in typical situations, as well as treatment of specific high priority sites.

Programmatic Protocols – The following protocols are proposed for typical treatment methods and the typical situations where these methods would be applied:

Foliar application of herbicide – Foliar application involves spraying or wiping herbicide on the leaves of NNIS plants. This method would be used for targeted spot applications where NNIS plants are scattered among desirable vegetation. It also would be used to broadcast herbicide over large, continuous NNIS infestations. Aerial application is not proposed.

Cut surface application of herbicide – Cut surface application of herbicide is used to control NNIS trees and shrubs. Several cuts are made in the outer bark of the tree or shrub, and an herbicide solution is squirted onto the exposed cambium (inner bark). Alternatively, the plant can be cut down and the herbicide solution applied to the stump.

Basal spray application of herbicide – Basal spray is similar to cut surface in that the herbicide is applied directly to the lower stem of NNIS trees and shrubs. However, basal spray differs by applying the herbicide solution to the outer bark, without making any cuts.

Hand pulling – Very small infestations of weak-rooted NNIS plants can be controlled through pulling the plants up by hand. This method is useful for herbaceous and small woody NNIS that are interspersed with high-value non-target plants such as threatened, endangered, or sensitive species.

Mowing – Mowing can be useful for preventing seed production and exhausting root reserves in annuals, biennials, or short-lived perennials. It can be accomplished using tractors, brush hogs, mowing machines, scythes, or string trimmers. Mowing is sometimes used in lieu of herbicides where soil or water quality concerns exist.

Grubbing – In situations where herbicide use is undesirable and mowing and hand pulling are not effective, NNIS plants may be dug out by the roots using tools such as grubbers, weed wrenches, shovels, plows, or disc harrows.

Biological control – Of the variety of high priority NNIS in need of control on the Forest, only the knapweeds are known to be susceptible to effective biological control agents. Several species of seedhead feeding and root boring flies, moths, and beetles may be used to control knapweeds. These biological control agents eat only knapweeds. If biological control agents become available for other species, these agents may be used after they have passed standard U.S. Department of Agriculture screening.

Typical treatment situations – We anticipate that most NNIS control needs on the Forest would fall into one of the following situations:

- *Forest roads* – Many infestations occur along Forest roads because of their function as dispersal vectors. Most NNIS in this situation are low growing due to recurrent maintenance; therefore, foliar application of herbicide would be the most common control method. Carefully timed mowing may be used to control seed production in widespread annuals such as Japanese stiltgrass.
- *State roads and highways* – Some infestations occur where state roads and highways traverse National Forest land. Control activities would be similar to those along Forest roads, but coordination with the West Virginia Division of Highways would be necessary.

- *General forest areas* – Many high priority NNIS have penetrated into natural habitats via old skid routes, trails, or overland seed dispersal. Any of the control methods outlined above may be used on these infestations, depending on the species to be controlled and the presence of other resource concerns.
- *Near streams or other bodies of water* – A Forest-wide effort to control high priority NNIS that threaten high value ecosystems cannot avoid control efforts near water bodies. Control methods that do not use herbicides would be used whenever possible. Where herbicides must be used within 100 feet of water, only herbicides registered for aquatic use would be used. Where herbicides must be applied to emergent vegetation, only wick or glove applicators would be used.
- *Near rare plant and animal occurrences* – NNIS plants may need to be controlled to protect occurrences of threatened, endangered, and sensitive plants and animals from aggressive competition or ancillary effects. Control methods that do not use herbicides would be used whenever possible. Where herbicides must be used within 50 feet of known occurrences, only spot application methods would be used. Care would also be used to minimize the non-target effects of hand and mechanical control methods (trampling, soil disturbance, cutting).

Site-Specific Treatments – In keeping with the needs outlined above, the proposed treatments of existing infestations focus on those that threaten botanical areas, candidate research natural areas, National Natural Landmarks, TES species habitat, landscape-scale ecological reserves, tree regeneration, and roads and facilities. Treatments of continuous infestations would total approximately 193 acres; spot treatments would be conducted across another 4,921 acres. A brief discussion of focus areas for treatment follows. Maps and tables containing site-specific detail are available on the Forest's web site at http://www.fs.fed.us/r9/mnf/environmental/proposed_projects/proposed_index.htm. Hard copy maps and tables can be obtained by contacting the Team Leader.

Parsons Area – Treatment of garlic mustard, oriental bittersweet, and common privet is proposed at four sites in the northern Cheat District in Tucker County.

Otter Creek Area – Control of Japanese stiltgrass, garlic mustard, and reed canary grass is proposed at five sites near the Otter Creek area. None of the sites is within the Wilderness, although one site is very close to the boundary.

Dolly Sods Area – Garlic mustard and reed canary grass would be controlled along Forest Roads 75 and 19 through the Dolly Sods Scenic.

Smoke Hole Area – Rare limestone glades and barrens communities would be protected by controlling Japanese stiltgrass, viper's bugloss, and spotted knapweed at selected locations. Desirable tree regeneration in several old harvest units would be favored by controlling tree of heaven, bush honeysuckles, and autumn olive.

Seneca Creek vicinity – Garlic mustard would be controlled at three sites around the Seneca Creek back country.

Laurel Fork vicinity – Garlic mustard control is proposed at two locations near the Laurel Fork wildernesses, although none of the locations are within the wilderness boundaries. Treatment is also proposed for an infestation of brown knapweed in a nearby range allotment.

East Fork Greenbrier/Burner Mountain area – Yellow iris would be controlled within the National Forest portion of Blister Swamp, and garlic mustard, Japanese stiltgrass, and bush honeysuckle would be controlled at several locations around the East Fork Greenbrier backcountry. Reed canary grass would be controlled in a complex of wildlife openings on Burner Mountain.

Cheat Mountain/Shaver's Mountain vicinity – Treatment is proposed for reed canary grass, bush honeysuckles, Japanese barberry, garlic mustard, and Japanese stiltgrass that threaten botanical areas, high quality wetlands, and limestone forests.

Ramshorn/Shock Run area east of Dunmore – Control is proposed for extensive garlic mustard infestations that threaten oak ecosystem restoration efforts. Control is also proposed for small infestations of Japanese privet and Japanese stiltgrass.

Buzzard Ridge – Several emerging infestations of garlic mustard are proposed for control.

Highland Scenic Highway area – Numerous invasive species growing along the shoulders of the highway would be controlled. Several small infestations of garlic mustard would be controlled near campgrounds and along forest roads nearby.

Cranberry area – To protect high quality ecological communities, garlic mustard, reed canary grass, crown vetch, and yellow iris would be controlled at several locations. Bush honeysuckle and autumn olive would be controlled at Summit Lake to facilitate maintenance of the dam.

Middle Mountain near Rimel – Garlic mustard and tree of heaven would be controlled at several locations to eliminate threats to oak ecosystem restoration efforts.

Anthony Creek area – Chinese yam, crown vetch, garlic mustard, and Japanese honeysuckle would be controlled at three locations in and near botanical areas and a recreation site.

Future Treatment Activities – Although this proposed action identifies many specific sites across the Forest for treatment, it is likely that additional high priority treatment sites will be discovered. Therefore, the proposed action provides for the treatment of these additional sites after a review of the condition of any resources that may be affected. At a minimum, this review would involve wildlife, aquatics, botany, TES species, silviculture, recreation, and cultural heritage. Treatment activities must involve situations similar to those programmatic and site-specific situations already analyzed, and any resource effects must be within the scale and scope of effects already analyzed. Line officer review and approval would be required prior to any treatment. New herbicides and treatment methods would not be used without appropriate additional NEPA analysis and documentation.

Public Involvement

Scoping (initial public involvement) for this project is being initiated with this letter. Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action and will be available for public inspection.

I look forward to your participation in the management of the Monongahela National Forest.

Sincerely,

/s/ Clyde N. Thompson
CLYDE N. THOMPSON
Forest Supervisor