

# **Drift Creek Knotweed Eradication Project**

## **Decision Notice and Finding of No Significant Impact**

**Siuslaw National Forest  
South Zone District  
Lincoln County, Oregon**

**September 2005**

**Lead Agency: USDA Forest Service**

**Responsible Official: William Helphinstine, District Ranger**  
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## **Project Background, Area, and Need**

The Drift Creek Knotweed Eradication Project (the Project) includes actions designed to eradicate knotweed on National Forest System (NFS) lands in the lower Drift Creek watershed.

The Project area includes an infestation of giant knotweed on the northeast side of the oxbow meadow, along Drift Creek and extending into the meadow. The infestation covers about 0.15 acre. The project area is located in Township 13 south, Range 11 west, Section 22; in Lincoln County. The Project is within riparian and late-successional reserve land allocations, as described in the Northwest Forest Plan.

The need to eradicate knotweed in the Project area was identified in chapter 1 of the Project environmental assessment (EA).

The decision to be made is whether to implement actions designed to meet the Project need by selecting one of the action alternatives (Alternative 2 or 3), or to not conduct these actions by selecting Alternative 1 (no action).

## **My Decision**

I have decided to implement the actions described under Alternative 3 of the Project EA. Alternative 3 will eradicate the colonies of giant knotweed by injecting stems of individual knotweed plants with up to 5 ml of AquaMaster®, a formulation of glyphosate registered by the Environmental Protection Agency for use in aquatic environments. Up to 2 gallons per year of AquaMaster® could be used on the site. The first application would be in late summer or early fall 2005, followed by replanting the treated area with willow cuttings or native grass seed. The site will be monitored the following spring for treatment effectiveness. If any giant knotweed is found, a second glyphosate injection treatment is warranted, followed by additional planting. Up to four years of treatment may be required to eradicate the infestation. In making this decision, I have reviewed the Project EA, its appendices, and other project-file documents, including the associated biological opinions. One supportive comment was received during the 30-day public comment period.

Project design criteria, including mitigation and monitoring requirements (EA, appendix A), are incorporated into the project to ensure protection of natural resources.

## **Reasons for the Decision**

Alternative 3 was selected because it meets the objective of preventing the spread of the giant knotweed into the oxbow meadow (Project EA, chapter 1). The spread of knotweed would eventually preclude the restoration of estuarine function in the oxbow meadow area.

The Project planning area is part of the larger Lower Drift Creek Management Plan (2004), a document that recommends actions to restore natural processes in the lower Drift Creek area. The actions in Alternative 3 are designed to protect estuarine and watershed function in the Project area.

Project actions under Alternative 3 are designed to protect aquatic resources in the short term and maintain or enhance the quality and productivity of these resources in the long term. No unacceptable cumulative effects are expected. Many beneficial effects will accrue from implementing the Project, and the risk associated with any potential negative effects, discussed in chapter 3 of the Project EA, is low.

In my review of the Project EA, its appendices, and other project-file documents, I believe the information provided to me is adequate for a reasoned choice of action. I am fully aware that the selected alternative will have some unavoidable adverse environmental effects such as soil disturbance (EA, page 11); temporarily introducing fine sediment to Drift Creek (EA, page 12); possible introduction of glyphosate into Drift Creek (EA, page 13); and short-term, localized reductions in air quality from dust and vehicle emissions and a temporary increase in passenger vehicle traffic (EA, page 20). I have determined, however, that the benefits to freshwater and estuarine aquatic resources justify unavoidable adverse environmental effects. No irreversible resource commitments or irretrievable commitment of resources are expected (EA, page 20).

In making this selection, I have also reviewed information in the administrative record, including but not limited to the Siuslaw Forest Plan (1990), as amended by the Northwest Forest Plan (1994); the Lower Drift Creek Management Plan (2004); the Late-Successional Reserve Assessment, Oregon Coast Province Southern Portion (1997); consultation files and records involving the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration's NOAA Fisheries; public and other agency comments; and applicable laws and regulations.

### **Reasons for Not Selecting the Other Alternatives**

Alternative 1, the no-action alternative, does not create obvious negative effects, but it also does not meet the Project need. Without action, giant knotweed would degrade estuarine and freshwater aquatic habitat and water quality.

Alternative 2 would use manual and mechanical methods to treat the knotweed infestation. Based on the analysis in the Project EA and additional information—knotweed spreads if improperly treated, as occurred in the Yachats watershed—indicating the potential harm to downstream landowners, I decided not to select Alternative 2.

### **Alternatives Considered**

Before selecting Alternative 3, I considered Alternative 1 (no action), Alternative 2, and other alternatives that were eliminated from detailed study in the Project EA.

Alternative 1, no action—Alternative 1 is fully described in chapter 2 of the Project EA, page 6. The analysis of the effects of Alternative 1 is disclosed in chapter 3 of the Project EA. The no-action alternative forms the basis for a comparison between meeting the project needs and *not* meeting the project needs. This alternative provides baseline information for understanding changes associated with Alternatives 2 and 3 and expected environmental responses as a result of past management actions.

Alternative 2, manual and mechanical treatment, with planting—Alternative 2 is fully described in chapter 2 of the Project EA, pages 6 and 7. The analysis of the effects of Alternative 2 is disclosed in chapter 3 of the Project EA.

Alternative 3, glyphosate treatment, with planting—Alternative 3 is fully described in chapter 2 of the Project EA, page 7. The analysis of the effects of Alternative 3 is disclosed in chapter 3 of the Project EA.

### **Alternatives considered but eliminated from detailed study**

Another alternative was considered by the District Ranger, based on knotweed treatment or eradication methods described in Common Control Measures for Pacific Northwest Invasive Plants (2004). This alternative was eliminated from detailed study because there is a low likelihood that grazing by goats will meet the objective of eradicating knotweed from the site and establishing desirable vegetative cover.

### **Help from the Public and Other Agencies**

To meet desired time frames for implementing the project, scoping and the notice of availability of the preliminary analysis was conducted concurrently. After considering the identified problem to be addressed with this project and developing a proposal to correct the problem, letters describing the actions considered in the proposed Drift Creek Knotweed Eradication Project were mailed to about 100 individuals, agencies, and organizations identified as potentially interested in the proposed project and analysis. The notice of availability for Drift Creek Knotweed Eradication Project Preliminary Analysis was included in the July 18, 2005 letter. The legal notice was published in the Eugene Register-Guard on July 22, 2005, informing the public that the preliminary analysis is available for a 30-day review and comment period. Public comment on the proposed project was also solicited through the Siuslaw National Forest's quarterly "Project Update" publications, the Corvallis Gazette-Times in Corvallis, Oregon, and the Newport News-Times in Newport, Oregon. Copies of the preliminary analysis were mailed to interested persons or to those who requested a copy of the document, and were made available at the Siuslaw National Forest Headquarters in Corvallis, and the District offices in Waldport and Florence. The preliminary analysis was also posted on the Forest's website.

The July 18, 2005 letter and legal notice indicated the beginning and end of the comment period. The comment process was described and Forest Service contact persons were identified. The comment period ended at the close-of-business on August 22, 2005. One person commented during this period, indicating his support for the Project and citing other successful efforts to eradicate knotweed, using glyphosate injection.

Field reviews by the interdisciplinary team, the Forest planning staff, and the Lincoln County knotweed specialist were conducted in the project area during the planning process. The public was invited to a field trip on July 26, 2005—no one attended.

The Project was designed to meet the design standards in the Biological Opinion for the Drift Creek Knotweed Eradication Project issued by NOAA-Fisheries on June 10, 2003 (Reference number 2003/00261). The Oregon Coast coho salmon are currently not listed under the Endangered Species Act. NOAA-Fisheries recently completed a review of the biological status of the Oregon Coast coho salmon and on June 14, 2004 proposed to list the Oregon Coast coho salmon as a threatened species under the Endangered Species Act. As a species proposed for listing as threatened, the USDA Forest Service is required to confer with NOAA-Fisheries on any action that is likely to jeopardize the continued existence of the species. The biological evaluation for this project concluded that the project may impact individual coho or coho habitat but will not jeopardize the continued existence of the species.

Based on the Biological Opinion for the Drift Creek Knotweed Eradication Project issued by NOAA Fisheries on June 10, 2003, the project will not adversely affect Oregon coast coho and Chinook salmon essential fish habitat as described by the Magnuson-Stevens Act.

NOAA Fisheries, on December 14, 2004, proposed the designation of critical habitat for Pacific salmon and steelhead in Washington, Oregon, and Idaho. This proposed rule designated some of the streams within the project area as critical habitat for Oregon Coast coho salmon. Effects to the streams proposed for designation as critical habitat were addressed in detail with the Forest Service March 5, 2003 biological assessment. Consultation with NOAA Fisheries will occur if streams within the project area are formally designated as critical habitat in the final rule.

### **Finding of No Significant Impact (FONSI)**

Based on the site-specific environmental analysis documented in the Drift Creek Knotweed Eradication Project Environmental Assessment, I have determined that the activities described do not constitute a major Federal action and would not significantly affect the quality of the human environment; therefore, an Environmental Impact Statement is not needed. This determination was made in light of the following factors:

#### Context

1. This action is very small in terms of society as a whole. Project activities have been viewed and approved in a Regional context through the Siuslaw National Forest Land and Resource Management Plan (USDA 1990), as amended by the Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl (USDA, USDI 1994). This action only affects a small portion of the Forest, which in turn, is a very small portion of the Region.
2. The site-specific activities that are authorized and guided by this decision are limited in scope and duration. Some minor adverse effects are expected. However, given the renewable nature of the resources, these effects are expected to be short-term. No long-term adverse effects are expected.

## Intensity

1. Project actions will have both beneficial and adverse effects. Potentially adding small amounts of glyphosate to Drift Creek may be considered an adverse effect. However, I have considered the benefits that the ecosystem will receive from implementing the Project actions and find that the overall beneficial effects to the ecosystem outweigh any short-term adverse effects. Further, I find that when considered alone, the adverse effects of this project are not significant (EA, chapter 3).
2. No significant adverse effects to public health or safety have been identified (EA, pages 17 and 21).
3. The characteristics of the geographic area do not make it uniquely sensitive to the effects of project actions. Past actions of similar intensity in similar areas have not indicated any significant adverse effects (EA, chapter 3).
4. The Drift Creek Knotweed Eradication Project Environmental Assessment has disclosed direct, indirect, and cumulative effects to soil, water, aquatic and terrestrial species, and other components of the human environment. There are no significant direct, indirect, or cumulative effects anticipated from implementing project actions. Project actions will prevent estuarine function from being degraded. The analysis of cumulative effects considered past, present, and reasonably foreseeable future actions on National Forest lands as well as for other ownerships in the affected watershed (EA, chapter 3).
5. Based on the pre-project survey and record search of the Project area, actions associated with the Project will have “no effect” (as defined in 36 CFR 800.5 [b]) on any listed or eligible heritage (cultural) resources. If a heritage site is discovered during project implementation, work will be stopped until the site is evaluated or the project has been altered to avoid the site (EA, page 21; EA, appendix A, page 27).
6. Based on the NOAA-Fisheries Biological Opinion on effects to aquatic species along with the wildlife and botany biological evaluations prepared for the Project, the effects on Federally listed aquatic and terrestrial species are not found to be significant (EA, chapter 3; NOAA Fisheries Biological Opinion, June 10, 2003, Wildlife Specialist Report, July 5, 2005; Botanist Report, June 25, 2005).
7. The Project is in compliance with relevant Federal, State and local laws, regulations and requirements designed for the protection of the environment. The Project will meet or exceed State water and air quality standards and is consistent with the Oregon Coastal Management Program as required by the Coastal Zone Management Act (EA, page 21; EA, appendix A, page 26).
8. The effects from the Project on the quality of the human environment are not found to be highly controversial in the realm of science (EA, pages 2 and 3; EA, chapter 3).

9. The Project's environmental effects are not uncertain or unknown. Planned actions are similar to those already accomplished on similar lands on the Forest and several scientific studies have been conducted that support the Project's treatment strategies (EA, chapter 3).
10. Actions that will be implemented by the Project do not set a precedent for future actions, because similar actions have been implemented in the past (EA, page 7; chapter 3).

### **Other Disclosures**

All measures contained in the Project EA (including appendix A) will be incorporated to comply with the Record of Decision for the Final Environmental Impact Statement for Managing Competing and Unwanted Vegetation published December 1988 and the subsequent Mediated Agreement of May 1989.

The Project will have no significant adverse effects on wetlands, floodplains, farmland, rangeland, parkland, wilderness, wild and scenic rivers, or inventoried roadless areas; minority groups, civil rights, women, or consumers; Indian social, economic, subsistence rights, or sacred sites; and heritage resources (EA, page 21).

Actions will be designed to prevent the spread of invasive plants, including noxious and undesirable weeds. Cleaning of off-road equipment pursuant to Executive Order 13112, dated February 3, 1999, will be required. (EA, appendix A, pages 25 to 27).

### **Findings Required By Other Laws**

Based on the analysis in the Drift Creek Knotweed Eradication Project Environmental Assessment, I find the selected alternative to be consistent with the Siuslaw National Forest Land and Resource Management Plan (USDA 1990), as amended by the Northwest Forest Plan (USDA, USDI 1994) and is designed to meet or exceed the objectives of the Aquatic Conservation Strategy as set forth in the Northwest Forest Plan (EA, page 19).

The selected alternative is consistent with the National Forest Management Act implementing regulations, including the seven management requirements listed in 36 CFR 219.27, a through g:

- a. *Resource protection*—The Project EA includes criteria designed to protect resources and will apply practices as described in General Water Quality Best Management Practices (BMPs), Pacific Northwest Region, November 1988 (EA, appendix A, pages 25 through 27);
- b. *Vegetation manipulation of tree cover*—Willow will be planted in sites where knotweed was eradicated. (EA, page 7);
- c. *Silvicultural practices that apply to timber harvest and cultural treatments*—Willow will be planted in sites where knotweed was eradicated. (EA, page 7);
- d. *Even-aged management in the forest*—No even-aged management is proposed. (EA, page 7);

- e. *Riparian area protection*—Existing shade will be maintained in riparian areas. Project actions are expected to protect estuarine function in the long term. (EA, chapter 3);
- f. *Conservation of soil and water resources*—The Project is consistent with the Aquatic Conservation Strategy objectives and includes best management practices (BMPs) and other measures designed to protect, enhance, or minimize effects to soil and water resources. Actions are expected to protect estuarine function in the long term. (EA, pages 10 to 15, and 19; EA, appendix A); and
- g. *Preserve and enhance the diversity of plant and animal communities*—By eradicating knotweed and planting affected sites with willow and native grasses, the project is expected to improve habitat conditions for several plant and animal species. (EA, pages 14 to 16).

### **Implementation Date**

Implementation of this project may proceed immediately after publication of a legal notice in the Eugene Register-Guard.

### **Administrative Review and Appeal**

As stated in 36 CFR 215.7 (b) (3), this decision is not subject to appeal pursuant to Forest Service regulations at 36 CFR 215.12 (e) (1).

### **Contact Person**

For further information regarding this project, contact Paul Thomas or Jan Robbins, South Zone Ranger District, Waldport Office, 1049 SW Pacific Coast Hwy, Waldport, OR 97394, or phone at (541) 563-8400.

### **Responsible Official:**

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Date