

# **FINDING OF NO SIGNIFICANT IMPACT**

## **AREA-WIDE NON-NATIVE INVASIVE SPECIES ERADICATION**

### **U.S. FOREST SERVICE**

#### **LAND BETWEEN THE LAKES, NATIONAL RECREATION AREA**

#### **LYON/TRIGG COUNTIES, KY AND STEWART COUNTY, TN**

##### **Summary**

The United States Forest Service proposes to initiate eradication efforts of non-native invasive plant species (NNIPS) in order to restore and maintain the native natural diversity of forested and upland meadow systems within Land Between the Lakes, National Recreation Area (NRA). By focusing on multiple species, it is the NRA's intent to slow the spread, and wherever possible, to eradicate NNIPS. The Programmatic Environmental Assessment (EA) attached to this document analyzes the consequences of the following 2 alternatives: 1) no action and 2) the proposed action, the preferred alternative – utilization of an Integrated Pest Management (IPM) strategy. We chose the preferred alternative over the No Action alternative. Detailed descriptions of each alternative and their environmental consequences are provided in the Programmatic EA.

This Finding of No Significant Impact (FONSI) documents our conclusion that the proposed action will not have any significant impacts on the quality of the human environment.

##### **Background**

The prevention and control of NNIPS is a critical stewardship responsibility of the Forest Service. The project area contains approximately 170,000 acres over which inventory and monitoring have shown significant presence and a wide variety of NNIPS on the NRA.

They have negative impacts on the environment and natural resources, agriculture and food production systems, water resources, human, animal and plant health, infrastructure, economy, energy, cultural resources and military readiness. Every year, invasive species cost the United States billions of dollars in economic losses and other damages.

The majority of NNIPS occur along roadsides, in recreation areas, along trails, at trailheads, and open areas such as wildlife openings, utility corridors, and planted loblolly pine stands. But they can occur anywhere across the landscape posing a serious threat to native ecosystems, recreation opportunities, and sustainable forest management. NNIPS species degrade wildlife habitats and ecosystems primarily by displacing native species resulting in a reduction in biodiversity and species richness. Once established on a new site, NNIPS typically build carbohydrate and/or seed reserves very quickly and the rate of spread often increases over time making their control more difficult. These disruptions within an ecosystem can often have many other direct/indirect consequences, including an altered fire regime, decreases in water and nutrient availability, and significant declines in species diversity.

The NRA is at risk for the additional spread and colonization of NNIPS. This risk is increased by management activities (any activity which disturbs the soil) currently being implemented throughout the NRA and natural events such as the 2021 tornados. These types of disturbances encourage the spread of NNIPS. This proposal will give the NRA the ability to address this issue. A partial list of the most common NNIPS known to occur across the NRA includes:

- Loblolly Pine
- Tree of heaven
- Kudzu

- sericea lespedeza
- autumn/Russian olive
- privet

### **Summary of Preferred Alternative**

This proposal is to remove/control all non-culturally important NNIPS from the NRA. In order to accomplish this goal, we propose to use commercial timber sales, timber cut and leave, mechanical disking, mechanical mastication, prescribed fire, approved pesticide applications, and grazing/browsing with domestic animal herds where feasible. These different treatments may be combined where and when it is effective and efficient to do so. This proposal would include the entire acreage of the NRA; including all land allocation prescription areas and any areas where use is permitted to other agencies, entities, and/or individuals. The NNIPS plant species list found in the Land and Resource Management plan (2004) (and accompanying documents) will serve as the master list for targeted NNIPS plants. If a proposed project cannot have appropriate protections identified, design features will be implemented to ensure resource protections are established. If protective measures cannot be reached, the project will be removed from consideration until such time as protections can be determined.

### **Public Involvement**

The NRA selected a combination of internal and external scoping for this Programmatic EA. External scoping is not required by the Council on Environmental Quality regulations for an EA level analysis. However, we solicited input from agencies who may have jurisdiction by law, entities with special expertise, and groups/individuals who may be affected by management actions in order to develop a broader perspective on relevant issues.

Potentially interested entities had the opportunity to provide comments on the Draft Programmatic EA during a 14-day interested comment period, July 16 through August 1, 2025. Two comment letters were received. Substantive comments were addressed and the Programmatic EA and FONSI written accordingly.

The NRA sent initial scoping letters to potentially interested parties in July of 2025, notifying them the NRA was analyzing the effects of implementing management strategies for NNIPS found across the entire Area. In total, scoping invitation letters were sent to 377 individuals (a list of entities contacted is included in the Project Record). Of the 377 entities that received an invitation, 2 responded. The first submittal included only one comment which focused on herbicide use specifically for one species. The second submittal included 11 comments. The 11 responses varied in content, however none of them opposed the NRA's general purpose and need of the proposed action.

One response was cautionary about partnering with various Non-Governmental Organizations (NGO's). One response was associated with restoration strategies. Two responses involved public outreach. One response involved herbicide use. One response cautioned about setting up a system for future managers to understand. Five responses included personal opinions regarding biological species found on the Area. All of the comments submitted by the public were either non-substantive or personal opinion/conjecture. No comments were submitted regarding the technical content of the document. Any recommended stylistic changes were incorporated into the final Programmatic EA.

### **Decision and Rationale**

For the reasons discussed herein and more thoroughly in the Programmatic EA, Alternative 2 (Proposed Action) has been selected as the preferred alternative. Alternative 2 is the sustainable and adaptable approach to managing or eradicating invasive plants. Alternative 2 uses all available tools to minimize risk to human health and the environment. Alternative 2 provides decision makers flexibility in selecting

appropriate tools to accomplish management goals effectively. Alternative 2 is also consistent with the FS mission and Policies including: the Biological Integrity, Diversity, and Environmental Health Policy; and the Integrated Pest Management Policy.

The Programmatic EA provides a compelling case for the purpose of and need for this action, including the benefits of restoring native habitats which are affected by loblolly pine and kudzu, as well as the others listed in the programmatic EA and Area Plan. The implementation of this management strategy will increase the speed of future response actions and will reduce the potential for invasive plants to spread to habitats elsewhere in the Area and state.

The analysis in the Programmatic EA indicates there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of the preferred alternative.

Copies of the Programmatic EA are available upon request from the Land Between the Lakes Office, 100 Van Morgan Road, Golden Pond, KY 42211, or available for download from the website at <https://www.landbetweenthelakes.us/managing-land/managing-the-land/projects/>

I find that all reasonable alternatives were considered in the evaluation of this action. I also find that this action complies with the role of the Forest Service in implementing the National Invasive Species Act of 1996 and the meaning of Executive Orders 13751 and 13112.

Therefore, based on a review and evaluation of the Programmatic EA, I have determined the proposed IPM strategy is not a major Federal action which would significantly affect the quality of the human environment within the meaning of the NEPA's Section 102 (2) (c). Accordingly, preparation of an Environmental Impact Statement on the proposed action is not required.

James R. McCoy

Date

Area Supervisor

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