# FINDING OF NO SIGNIFICANT IMPACT GREAT LAKES INVASIVE PLANT MANAGEMENT PLAN / ENVIRONMENTAL ASSESSMENT NATIONAL PARK SERVICE MIDWEST REGION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) has prepared an environmental assessment (EA) to examine alternatives and potential environmental impacts associated with the proposal to implement invasive plant management treatments to preserve fundamental resources and values within ten park units in the western Great Lakes: Apostle Islands National Lakeshore (APIS), Grand Portage National Monument (GRPO), Ice Age National Scenic Trail (IATR), Indiana Dunes National Lakeshore (INDU), Isle Royale National Park (ISRO), Mississippi National River and Recreation Area (MISS), Pictured Rocks National Lakeshore (PIRO), Sleeping Bear Dunes National Lakeshore (SLBE), St. Croix National Scenic River (SACN), and Voyageurs National Park (VOYA). The EA proposes potential management options for terrestrial and emergent wetland invasive plants. Implementation of these treatments would aid in the preservation or restoration of fundamental natural resources. The NPS proposes to implement these management treatments on lands managed by the NPS. While this EA is intended only for lands managed by the NPS, the NPS will seek to work cooperatively with other landholders throughout the Great Lakes who may wish to manage their property in a manner consistent with the goal of this EA.

Based on the purpose and need for the project, the Great Lakes Invasive Plant Management Plan/EA (IPMP/EA) identifies long-term invasive plant management strategies that would reduce the impacts of (or threats from) invasive plants to natural and cultural resources, and provide opportunities for restoring native plant communities and cultural landscapes.

As this project involves multiple parks, a primary goal of the IPMP/EA is to provide park staff with broad, adaptive strategies of invasive plant management treatment options; a plan that would guide park staff to select the most appropriate treatment option(s), or combination of treatment options. This strategy allows parks to minimize invasive plant impacts and maximize park-specific integrated pest management success.

Proposed treatment measures identified in this IPMP/EA are based on sound integrated pest management. Integrated pest management is defined as a decision-making process that coordinates knowledge of pest biology, the environment, and available technology to prevent unacceptable levels of pest damage, by cost-effective means, while posing the least possible risk to people and park resources. Integrated pest management can also include reducing the risk of new introductions, determining acceptable levels of infestation, use of multiple techniques for control, and continued monitoring and management.

Another primary goal of the IPMP/EA is to serve as a programmatic NEPA document for invasive plant management within each of the ten parks. That is, future invasive plant activities addressed by this IPMP/EA would not require additional analysis under NEPA for park-specific actions, so long as the impacts of these specific actions have been adequately addressed in the IPMP/EA.

This Finding of No Significant Impact (FONSI) and the EA constitute the record of the environmental impact analysis and decision-making process for the project. The NPS will implement the Preferred Alternative, based on fundamental and significant resources and values-based invasive plant

management. The Preferred Alternative includes measures for protection of park resources and was selected after careful review of resource and visitor impacts and public comment.

#### **Selection of the Preferred Alternative**

This IPMP/EA evaluated three alternatives to manage invasive plant species; the No Action Alternative 1 (continue current management), Alternative 2, the Preferred Alternative (fundamental and significant resources and values-based invasive plant management), and Alternative 3, species-based invasive plant management. Alternative 2 is the NPS Selected Alternative because it best meets the purpose and need for the project.

Under the Selected Alternative, parks would have the option to use any of the treatment options defined in the IPMP/EA. Plants to be managed under this alternative include invasive, non-native, non-invasive, or native species. However, the priority for invasive plant management would be given to the stewardship of fundamental and/or significant resources and values through management of plant species that alter the desired resource condition.

For the purposes of this IPMP/EA, fundamental resources and values are broadly defined as systems, processes, features, visitor experiences, stories and scenes that deserve primary consideration and management because they are critical to maintaining the park's purpose and significance. Fundamental resources and values are subject to periodic review and updates based on new information and changing conditions. Significant resources that are not necessarily fundamental resources could also be given management priority under this IPMP/EA. Park-specific fundamental and/or significant resources and values are defined within their enabling legislation, general management plans, and other park-specific documents.

Under the Selected Alternative, resource managers would use the IPMP/EA as guidance for helping determine invasive plant management priorities. The guidance for setting management priorities under the Selected Alternative is unique in that it focuses largely on preventing or reducing impacts to fundamental or significant resources and values. Once treatment priorities have been established, park staff would then use standardized Integrated Pest Management principles to evaluate specific treatment actions.

#### Mitigation Measures

The Selected Alternative would predominately result in beneficial effects. In areas where there is potential for adverse impacts, the following mitigation measures would be applied.

To minimize the potential impacts from personnel and equipment, the following general Best Management Practices (BMPs) will be implemented:

- Equipment used for invasive plant management would be power washed and/or vacuumed prior to entering a park to reduce the potential for accidentally introducing invasive plants from another area.
- To limit the potential for treatment equipment and vehicles to spread invasive plant seeds, treatments would be completed before seed becomes viable, as feasible and to the maximum extent possible.

- Vehicles and UTVs (utility terrain vehicles) would use existing roads and trails to the maximum extent practical.
- UTVs would be transported by trailer from one general area of the park to another to avoid unnecessary cross-country travel, tracks, and to promote safe operation.
- Contractors would be educated on the importance of invasive species prevention including the power washing of vehicles and equipment prior to entering parks, cleaning clothes and footwear, chainsaws, and other hand tools.

Under the IPMP/EA a strong emphasis would be placed on trying to prevent invasive plant infestation in wilderness areas (including the categories of eligible, study, proposed, recommended, and designated wilderness). Parks will, to the extent practicable, employ the following BMPs and mitigation measures:

 Efforts would be made to minimize the number of trips and to reduce the visibility, duration, and sounds of invasive plant management activities in wilderness areas.

To ensure that invasive plant management activities do not have the potential to adversely affect cultural resources and ethnographic resources, parks will, to the extent practicable, employ the following BMPs and mitigation measures:

- NPS cultural resource specialists would be consulted to determine if cultural resources are
  present in areas proposed for invasive species treatment, or if the area needs to be surveyed for
  cultural resources prior to work being done.
- Pesticides would not be directly applied to historic structures with limestone grout, hearth
  features, or cultural resources comprised of organic material, such as bone, pollen, seeds, and
  materials made from plant fiber.
- If cultural resources are inadvertently uncovered during surface-disturbing activities, NPS would suspend operations at the site.
- To minimize the impacts of invasive plant management on traditional use plants, parks would identify traditional use plants based on consultation with tribes and avoid impact to those plants as is practicable.

To minimize the impacts of invasive plant management on visual resources and landscapes, parks will, to the extent practicable, employ the following BMPs and mitigation measures:

- UTVs and other equipment would be routed along breaks in topography or behind existing tree groupings where possible.
- Use of equipment in high visibility areas would be avoided to the extent feasible.
- As feasible, UTVs used in high visibility areas would follow slope contours to minimize the potential for visual disturbance.
- Parks will limit the size of brush piles and strategically place brush piles such that there is minimal visual impact.
- Use of UTVs and other noise producing equipment for treatment (e.g., chainsaws) would be limited in soundscapes and/or timed to reduce impact noise levels.

To minimize the impacts of invasive plant management on soil resources, surface water, and wetlands, parks will, to the extent practicable, employ the following BMPs and mitigation measures:

- UTVs will be operated to minimize disturbance to vegetation and soils. UTVs will not be operated under conditions where soil is susceptible to compaction, erosion, or creation of wheel ruts.
- The number of vehicle and UTV passes off-road would be minimized to the extent possible.
- Personnel and equipment would avoid areas having sensitive soils or areas that are prone to erosion.
- Crossings to access treatment areas would be traversed at a right angle to the crossing.
- UTVs would be routed to avoid wetlands.
- Reseeding would be considered for areas prone to erosion.

To minimize the impacts of invasive plant management on general wildlife species (i.e., species that are not federally or state listed), parks will, to the extent practicable, employ the following BMPs and mitigation measures:

- Physical disturbance to ground nesting birds and burrowing animals would be avoided, to the extent possible.
- Care will be given to cause nest displacement or disturbance.
- Prior to the use of any pesticides, the resource manager would consider site specific environmental impacts effects of any selected pesticide.

To minimize the impacts of invasive plant management on federally listed, candidate, and or otherwise special status species parks will, to the extent practicable, employ the following BMPs and mitigation measures:

- Field personnel would be trained to recognize and avoid threatened, endangered, and candidate species in their work sites and travel routes, and would be provided information on locations of known habitats for listed or candidate species.
- If any proposed treatment has the potential to adversely affect listed or candidate species, NPS would formally consult with the USFWS prior to any action. Under the Great Lakes IPMP/EA, parks would also implement several species-specific BMPs designed to prevent non-target impacts of invasive species treatments on wildlife or fish species listed as threatened, endangered, or candidates for listing under the ESA. Some of these measures are described below. However, as new protective measures for federally listed or candidate species are developed by the USFWS, those measures would also be implemented as appropriate. Similarly, as new species are listed under the ESA, parks would be responsible for implementing protective measures for those newly listed species prior to invasive species treatment actions as appropriate.

#### Whooping Crane (Grus americana)

- If whooping cranes are present, a 0.5 mile buffer area would be established around any feeding
  or roosting areas. No invasive plant management activities would occur within this area while
  whooping cranes are present.
- A no-flight buffer area of 0.5 mile would be established around any nesting or foraging areas when whooping cranes are present.

#### Interior Least Tern and Piping Plover (Sterna antillarum athallasos and Charadrius melodus)

- Treatment areas would be evaluated for potential piping plover and interior least tern habitat
  before invasive plant treatment. Potential habitat for interior least tern includes dry, flat,
  sparsely vegetated sand and gravel bars within a wide, unobstructed, water-filled river channel.
  Potential habitat for piping plovers includes sparsely vegetated areas that are slightly raised in
  elevation, beaches that are 10 to 40 yards wide, and barren river sandbars.
- A no-flight buffer zone of 0.5 mile would be established around any active colonies.
- If interior least terns or piping plovers are found, a buffer zone of 0.25 mile would be established
  around any active nesting colonies. No invasive plant management activities would occur within
  this buffer zone during the active breeding period (from approximately April 15 to August 15, or
  as identified by park staff).

#### Gray Wolf (Canis lupus) and Eastern Wolf (C. lyacon)

Gray wolves and Eastern wolves occur within several of the Great Lakes parks. If wolves are
present in the area, no invasive plant management activities would be conducted within the
area of any dens, foraging areas, or rendezvous sites.

#### Pallid Sturgeon (Scaphirhynchus albus)

- Channel island tips would not be altered in any manner.
- Channel alternations that limit or eliminate shallow, sloping bank habitat would be avoided.
- No treatments that might alter flows in pallid sturgeon habitat (such as the diversion of water for irrigation) would be allowed.

#### Bald Eagle (Haliaeetus leucocephalus)

- While delisted by the ESA, bald eagles are still protected under the Bald and Golden Eagle Protection Act (BGPA), and protection is encouraged by the USFWS to prevent the need for relisting. The USFWS provides guidance for protecting bald eagles from land use activities in the Great Lakes Region at the following website:
  - http://www.fws.gov/midwest/eagle/guidelines/disturbnestingbaea1.html.
- Treatment areas would be evaluated for suitable bald eagle nesting and roosting habitat prior to
  conducting invasive plant management activities. Suitable nesting habitat consists of any
  mature stand of conifer or cottonwood trees in association with rivers, streams, reservoirs,
  lakes, or any significant body of water. Suitable roosting habitat is defined as any mature stand
  of conifer or cottonwood trees.
- As feasible, invasive plant treatment activities that involve tree removal or mechanized activity (e.g., chainsaws and UTVs) would not be completed within 660 feet (200 meter) of bald eagle nest sites during the nest-building, egg laying, and early brooding period (typically March to May).
- As feasible, invasive plant treatment activities that involve tree removal or mechanized activity (e.g., chainsaws and UTVs) would not be completed within 660 feet (200 meter) of known winter roost sites during the winter roosting season (typically November through mid-April).

- Clearing of live or dead trees greater than 12 inches in diameter at breast height (DBH) along streams, rivers, and wetlands would be avoided to the extent possible to help preserve potential bald eagle roosting or nesting habitat.
- Parks would avoid clear-cutting or removal of overstory trees within 330 feet (100 meters) of both active and alternate nests at any time.
- Parks would avoid timber harvesting operations, including road construction and chain saw and yarding operations, during the nesting season within 660 feet (200 meters) of the nest. The distance may be decreased to 330 feet around alternate nests within a particular territory, including nests that were attended during the current nesting season but not used to raise young, after eggs laid in another nest within the territory have hatched.
- Parks would employ selective thinning and other silviculture management practices designed to conserve or enhance habitat, including prescribed burning close to the nest tree, should be undertaken outside the nesting season.
- If burning during the nesting season is necessary, parks would implement the following BMPs in known bald eagle habitats:
  - Parks would conduct burns only when adult eagles and young are absent from the nest tree (i.e., at the beginning of, or end of, the nesting season, either before the particular nest is active or after the young have fledged from that nest).
  - o Parks would take precautions such as raking leaves and woody debris from around the nest tree to prevent crown fire or fire climbing the nest tree.
  - o Parks would avoid construction of log transfer facilities and in-water log storage areas within 330 feet (100 meters) of active and alternate nests.

#### **Karner Blue Butterfly**

• Prior to invasive species treatment in High Potential Range known to be occupied by Karner blue butterfly, or in lupine sites where Karner blue butterfly presence or absence is not known, NPS staff will review and implement guidelines provided in the Wisconsin Karner Blue Butterfly Habitat Conservation Plan Management Protocols, Pesticide Use Protocols, which are available at the following website: http://dnr.wi.gov/topic/ForestPlanning/hcpGuide.html. NPS staff will be trained in the identification of Karner blue butterfly habitats, including lupine species identification. As feasible, treatment activities within High Potential Range known to be occupied by Karner blue butterfly, or in lupine sites where Karner blue butterfly presence or absence is not known will be conducted outside the dates of April 15 – August 31.

#### **Threatened and Endangered Plants**

- Pesticide applicators would receive training on identification of threatened and endangered plants. If these plants were identified in the field, treatments would be halted until buffer areas are established.
- Where chemical treatment is needed near threatened or endangered plants, hand spraying or hand wicking would be prioritized.
- If boom treatments are used (UTVs or aircraft) to apply pesticides, a 50-foot no-spray zone would be established around threatened and endangered plants.
- Plowing, harrowing or other forms of tilling would not be used in areas where such activity
  would have an adverse impact on known populations of threatened or endangered plants.

- UTVs and off-road vehicle traffic would be used on a limited basis in areas where threatened or endangered plants are known to occur or have the potential to occur.
- Pitcher's Thistle Habitat:
  - o Prior to invasive plant treatment in potential Pitcher's thistle habitat, NPS staff will be trained in Pitcher's thistle identification. NPS staff will then complete pre-treatment surveys to determine if Pitcher's thistle occurs in proposed treatment areas. If occupied Pitcher's thistle habitat is documented, site-specific consultation with the USFWS will be conducted to determine how to avoid site-specific impacts to the species and/or forego invasive species treatment within occupied habitat.
  - Additional, site-specific consultation with the USFWS will be conducted prior to the use of biological controls or aerial spray applications chemical treatments in Pitcher's thistle habitat.

#### **Alternatives Considered**

Three alternatives were evaluated in the IPMP/EA: the no-action alternative and two action alternatives. Under Alternative 1, No Action, the ten national park units would continue invasive plant management under current management plans. Specifically, at many parks, this would mean that invasive plant management activities would only continue on a limited basis. Park resource managers would be limited to those treatment options that either qualifies as being categorically excluded (CE) from analysis under NEPA, or those treatments whose impacts have been previously addressed in other NEPA documents.

Alternative 2, fundamental and significant resources and values-based invasive plant management, is the Preferred Alternative, as described in the previous section.

Under Alternative 3, species-based invasive plant management, parks would have the option to use any of the treatment options defined in the IPMP/EA. However, under Alternative 3, priority would be given to the management and control of species that are legally mandated for control such as federally, state or local listed "noxious species." It is important to note that treatment would not be limited to the species defined above. Rather, treatment efforts would be prioritized such that these species are treated first.

Under Alternative 3, resource managers would use the IPMP/EA as a tool for helping to determine invasive plant management priorities. The guidance for setting management priorities under Alternative 3 is unique in that it employs a species-based approach to determine the highest priorities for treatment. Once treatment priorities have been established, park staff would then use standardized Integrated Pest Management principles to evaluate selected treatment actions.

#### **Environmentally Preferable Alternative**

The Preferred Alternative (the selected alternative) is the environmentally preferable alternative. The environmentally preferable alternative is determined by applying the six criteria suggested in §101 of NEPA. According to these criteria, the environmentally preferable alternative should 1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; 2) assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings; 3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences; 4) preserve important historic, cultural and

natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice; 5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and 6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources. Generally this means the alternative that causes the least damage to the biological and physical environment. It also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources (Council on Environmental Quality 1981).

The Preferred Alternative (the selected alternative), would provide a comprehensive method of addressing the objectives listed in the EA. This alternative creates standardized guidance to help parks prioritize selection of treatment areas based on park-specific resources and selection of invasive species management strategies, and to determine compliance under NEPA for each selection. This selected alternative uses current treatment options and allows for implementation of emerging/developing technologies and treatments. The Preferred Alternative also includes BMPs that will mitigate/reduce impacts on non-target resources.

#### Why the Preferred Alternative Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

## 1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial:

No long-term *major* adverse or beneficial impacts were identified that require analysis in an environmental impact statement. However, the selected alternative will result in short and long-term impacts to the environment. While the short-term impacts were considered negative, they were considered to have no negligible or minor impacts. Long-term impacts beyond a minor threshold were considered to be mostly beneficial. Impacts to general vegetation will be long-term, moderate, and beneficial. Impacts to rare and unusual vegetation will be long-term, moderate, and beneficial. Impacts to species of special concern will be indirect, long-term, moderate and beneficial. Impacts to unique ecosystems will be indirect, localized, long-term, moderate and beneficial. Impacts to recreation resources will be indirect, localized, long-term, moderate and beneficial. Impacts to park resources have the potential to be moderate, indirect and slightly negative based on the need for increased management activity at one park.

#### 2. The degree to which the proposed action affects public health or safety:

The selected alternative would have little impact on public health and safety. Visitor access to certain areas would be restricted during mechanical vegetation removal, prescribed fires, or herbicide application.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

The selected alternative includes several BMPs that are intended to reduce or mitigate potential negative effects of invasive plant treatments to cultural and ethnographic resources. Because this IPMP/EA is intended to provide invasive plant treatment options (not cultural or ethnographic resource

management tools), impacts to Cultural and Ethnographic Resources would be localized, short-term, and/or negligible. Prime farmlands are not within the resource areas of the ten parks included in the EA. The selected alternative will have a long-term, moderate and beneficial effect on park lands, wetlands, wild and scenic rivers and ecologically critical areas based on the analyzed impacts to general and rare/unusual vegetation, species of special concern, and unique ecosystems.

4. The degree to which the effects on the quality of the human environment is likely to be highly controversial:

There were no highly controversial effects identified during either the preparation of the IPMP/EA or during the public review period.

5. Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:

There were no highly uncertain, unique, or unknown risks identified during either the preparation of the IPMP/EA or during the public scoping or IPMP/EA review periods.

6. Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The selected alternative neither establishes a National Park Service precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

Cumulative impacts under the selected alternative for the past, present, and reasonably foreseeable future management activities include similar management options for invasive plant species by private landholders, Tribes and other state and federal agencies surrounding park lands. Using proper BMPs and adherence to state regulations, other past, present, and reasonably foreseeable future actions are expected to contribute very little to adverse impacts to all resources. Past, present, and reasonably foreseeable future actions are expected to add minor to moderate beneficial impacts to this project, since they all relate either directly or indirectly to it.

8. Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historical resources:

The selected alternative will not adversely affect any resources listed on, or eligible for, the National Register of Historic Places, nor will it impact any other significant scientific, cultural, or historical resources.

The Indiana Department of Natural Resources, State Historic Preservation Office (SHPO) was consulted and concurred with this finding in a letter dated May 1, 2012.

The Michigan SHPO was consulted but did not provide comments on the project.

The Minnesota SHPO was consulted and concurred with this finding in a letter dated June 25, 2012.

The Wisconsin SHPO was consulted and concurred with this finding in a consultation form dated May 8, 2012.

### 9. Degree to which the action may adversely affect an endangered or threatened species or its critical

Section 7 of the Endangered Species Act requires federal agencies to consult with U.S. Fish and Wildlife Service (USFWS) when any activity permitted, funded, or conducted by that agency may affect a listed species or designated critical habitat, or is likely to jeopardize proposed species or adversely modify proposed critical habitat. The NPS has identified six threatened and endangered species within the ten Great Lakes parks that have the potential to be affected by management actions within the Preferred Alternative: piping plover (Charadrius melodus), Michigan monkey flower (Mimulus glabratus var. michiganensis), Pitcher's thistle (Cirseum pitcheri), Eastern massasauga rattlesnake (Sistrurus catenatus catenatus), Pitcher-plant (Sarracenia purpurea), and Karner blue butterfly (Lycaeides melissa samuelis). As part of the programmatic EA, further consultation may be required for any site specific treatment that may affect a listed species or critical habitat.

In a letter dated April 30, 2012, the USFWS Bloomington Ecological Services Field Office concurred with the IPMP/EA's finding that invasive plant treatment may affect but is not likely to adversely affect federally threatened or endangered species or designated critical habitat. The USFWS Bloomington Field Services Office requested that additional mitigation be added to the EA, which are reflected in the errata sheet.

In a letter dated June 15, 2012, the USFWS East Lansing Ecological Services Field Office concurred with the IPMP/EA's finding that invasive plant treatment may affect but is not likely to adversely affect federally threatened or endangered species or designated critical habitat. The USFWS East Lansing Field Services Office requested that additional mitigation be added to the EA, which are reflected in the errata sheet.

In a letter dated April 11, 2012, the USFWS, Green Bay Ecological Services Field Office concurred with the IPMP/EA's finding that invasive plant treatment may affect but is not likely to adversely affect the piping plover or its designated critical habitat. The USFWS Green Bay Ecological Field Services Office requested a minor edit to the EA, which is reflected in the errata sheet.

The Minnesota USWFS was consulted but did not comment on the project.

#### 10. Whether the action threatens a violation of federal, state, or local environmental protection law:

The selected alternative will not violate any federal, state, or local environmental protection laws.

#### **Public Involvement**

Public involvement for the IPMP/EA involved two phases; a public scoping period to solicit input for the development of the document and a public review period for the document.

Public scoping for the project began in March 2011. On March 3, 2011, a pre-scoping courtesy letter was provided to the ten Great Lakes parks. The pre-scoping courtesy letter was intended for dissemination amongst working partners and interested parties of each park, and announced NPS' intent to prepare the IPMP/EA. The recipients of the pre-scoping courtesy letter were at the discretion of each park.

On March 10, 2011, a template press release was provided to the ten Great Lakes parks for release to the public March 21, 2011 through March 28, 2011. The recipients of the press release were also at the discretion of each park.

On March 17, 2011, a scoping brochure was provided to the ten Great Lakes parks for distribution by each park to Federal, State, and local agencies, elected officials, groups, and interested individuals. The scoping brochure provided information on the NPS purpose and need for the IPMP and asked for comments on the scope of issues to be addressed in the IPMP/EA. The distribution of the scoping brochure was also at the discretion of each park, which could have included park websites, email distribution lists, and mailing lists. The scoping brochure was also posted on NPS' Planning, Environment and Public Comment (PEPC) website at: http://parkplanning.nps.gov/ipmpea on March 28, 2011. Members of the public were afforded two different methods for providing scoping comments: electronically through the PEPC website or by mail at Great Lakes IPMP, c/o Kleinfelder, 300 E. Mineral Ave., Suite 7, Littleton, CO 80122-2655.

Project information was also provided to the public through other media outlets such as news articles, radio interviews, and websites prior to and during the public scoping period.

The official public scoping period was held from March 28, 2011 through May 2, 2011. Four comments were received through the PEPC website, and one typed letter was received through the contractor's mailing address, for a total of five scoping comments. The topics addressed by the public in these scoping comments were organized into four major subject areas that broadly describe the nature of the contents:

- Need landscape scale conservation efforts
- Potential Impacts concern for treatment types
- Existing conditions
- Other

The scoping comments were valuable in defining the alternatives and impact topics evaluated in the EA.

The public review period for the IPMP/EA began in April 2012. Specifically, the document was initially made available for a 30-day public review period (April 2 – May 2, 2012) on the project's web page, http://parkplanning.nps.gov/ipmpea. At the request of two parks, the public review period was extended to May 15, 2012. Members of the public were afforded two different methods for providing comments on the IPMP/EA: electronically through the PEPC website or by mail at Great Lakes IPMP, c/o Kleinfelder, 300 E. Mineral Ave., Suite 7, Littleton, CO 80122-2655.

Four comments on the IPMP/EA were received through the PEPC website, six typed letters were received through the contractor's mailing address, and three hand-written comments were received at SLBE Visitor Center. The topics addressed by the public in these EA comments were organized into four major subject areas that broadly describe the nature of the contents:

- Support for invasive plant treatment in the Great Lakes National Parks
- SHPO concurrence with IPMP/EA findings for cultural resources (see Section 8 above)
- USFWS concurrence with IPMP/EA findings for species and habitats listed under the ESA (see Section 9 above)
- Requests for additional mitigation for species and habitats listed under the ESA (see Section 9 above and errata sheet)
- Out of scope comments

#### Decision

The selected alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible, minor, or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, or other unique characteristics of the region. There are no unmitigated adverse impacts on sites or districts listed in or eligible for listing in the National Register of Historic Places. No uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Approved:

Michael Reynolds, Director

Date

Midwest Region