National Park Service

U.S. Department of the Interior

National Capital Region

FINDING OF NO SIGNIFICANT IMPACT

INVASIVE PLANT MANAGEMENT PLAN

National Capital Region: District of Columbia, Maryland, Virginia, and West Virginia

3/1/2017

The National Park Service (NPS) has prepared an environmental assessment (EA) to assess the potential impacts on the natural, cultural, and human environment that would result from implementing an Invasive Plant Management Plan (IPMP) at the 15 parks in the National Capital Region (NCR). The IPMP would ensure that all NCR parks have access to a range of methods used for the treatment of non-native invasive plant species, including chemical, biological, manual, mechanical, physical, and cultural treatment methods.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality (CEQ) for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and NPS Director's Order (DO) 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*. Compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA) has been completed in a process that was separate but parallel, to the NEPA process.

SELECTED ALTERNATIVE

As part of the EA process, the NPS identified Alternative 1: Implement the IPMP as its preferred alternative and has selected this alternative for implementation. The implementation of Alternative 1 will increase the options available to staff at individual parks to manage non-native invasive plant species. Specifically, the IPMP would:

- Establish priorities for the treatment of non-native invasive plants.
- Standardize and streamline the decision-making process regarding the treatment of non-native invasive plants across all 15 NCR parks.

The IPMP will prioritize the treatment of non-native invasive plants species at each park by both species and location. Each park within the NCR will develop an annual non-native invasive plant treatment strategy based on the IPMP that reflects current needs and funding resources.

Invasive plant species treatment methods that will be available to park managers under the IPMP include chemical, biological, manual, mechanical, physical, and cultural methods:

- **Chemical** treatment methods include the use of multiple types of herbicide. The use of chemical treatment methods consists of applying herbicides as prescribed by their labels, using a variety of application methods. Selective herbicides control certain target plants while limiting effects to non-target plants. Non-selective herbicides can be effective for treating invasive plants in areas where desirable plants are scarce or absent. Herbicides can be used to treat small patches of invasive plants where hand pulling or cutting is not feasible.
- **Biological** treatment methods involve the importation and release of host-specific natural enemies to aid in the management of non-native invasive plants. This method can be used to manage invasive non-native plants that lack effective natural enemies. To avoid damaging non-target species, biological control agents must be highly host-specific. Agents are tested for host

specificity initially in their native range and then in quarantine conditions in the United States. Agents are only approved for release if testing indicates a very low likelihood of non-target effects, as determined by the Technical Advisory Group for Biological Control Agents of Weeds, a group of experts that report to the US Department of Agriculture's Animal and Plant Health Inspection Service.

- **Manual** treatment methods refer to pulling or otherwise removing non-native invasive plants by hand or with the use of simple non-motorized tools such as hand-held pruners and clippers. Manual treatment is most effective for pulling shallow-rooted species. Manual pulling of deep-rooted species may require repeated treatment to effectively deplete the root system, as portions of roots can break off, remain in the soil, and regenerate. Hand pulling is conducted by removing as much of the root as possible while minimizing soil disturbance. Manual treatment methods can be used to treat individual plants or areas encompassing multiple plants.

- **Mechanical** treatment methods involve the use of cutting tools, pulling tools, power tools, or heavy equipment to inflict physical damage on or remove part or all of one or more non-native invasive plants. Hand-cutting tools are a treatment option for removing the aboveground portions of annual or biennial plants. The use of hand tools, like trowels, shovels, and pulaskis, is a simple form of mechanical treatment. These tools can be used to remove a larger portion of the root system or to sever the plant's taproot below the point where nutrients are stored. Pulling tools are a treatment option for removing individual plants that are deep-rooted.

- **Physical** treatment methods involve controlling invasive plant species with environmental alterations such as smothering, solar sterilization, thermal controls methods, and prescribed fire.
    - *Smothering and Solar Sterilization:* Infestations of non-native invasive plants can be smothered in small areas by covering the area with thick woven geotextile shade cloth, cardboard, plastic sheeting, or mulch. Shading the area with the cloth will generally kill all vegetation under the cloth if it is left in place for an extended period of time. Solar soil sterilization is a technique used to control vegetation and/or soil-borne pathogens. Clear plastic is spread over the soil surface and secured tightly around the edges. The plastic is left in place during the growing season for extended periods (weeks or months). Heat builds up between the soil and plastic on sunny days.
    - *Thermal Control:* Treating non-native invasive plants with heat destroys plant cells, disabling normal plant function and weakening the plant. Sources of thermal action can include open flame, hot water, steam, hot foam, or radiant heat.
    - *Prescribed Fire*: Prescribed fire treatments consist of applying fire to a predetermined area to reduce the growth of invasive plants and to increase the growth of desirable plants. It is likely that the use of prescribed fire would be subject to additional compliance requirements.

- **Cultural** treatments are practices that promote the growth of desirable plants and reduce opportunities for invasive plants to grow. Examples include irrigation and seeding of native plant species. Cultural treatment methods involve manipulating treatment areas to present invasive plants with effective native competitors.

ALTERNATIVES CONSIDERED BUT DISMISSED

The No Action Alternative was considered in the EA but was not selected for implementation. Under the No Action Alternative, NCR parks would continue to manage non-native invasive plants as they currently do. The No Action Alternative was not selected because it would not address the need to have a unified

strategy for the treatment of non-native invasive plants that provides the full range of available treatment strategies and a consistent approach across the NCR.

Additionally, eight conceptual treatment approaches were considered but dismissed from consideration in the EA:

- Analyzing each treatment methods addressed in the EA as a separate alternative. It was dismissed because this would substantially limit the parks' ability to manage invasive plant species given the wide range of such species and affected resources found throughout the region.
- Alternatives that prioritized the treatment of non-native invasive plant species by the adverse impact they pose to any particular park resources using all the treatment methods described in described in the EA. Because the value of specific types of resources in each park varies widely throughout the NCR, it was determined that such an approach would not provide the parks with sufficient flexibility in implementing the treatment methods.
- Making all the treatment methods described in the EA available to the NCR parks and implementing a protocol by which the parks would initially apply the least aggressive treatment methods followed by increasingly aggressive methods. Similarly, the NPS also considered an alternative whereby all of the treatment methods could be applied, beginning with the most aggressive method followed by decreasingly aggressive methods. It was determined that what constitutes a "more aggressive" treatment or "less aggressive" treatment would vary widely from site to site throughout the NCR and would not provide the parks with sufficient flexibility to choose and implement the various treatment methods. Therefore, these alternatives were dismissed.
- An alternative under which non-native invasive plants would only be treated during the regional growing season. The NPS also considered an alternative in which non-native invasive plants would be treated year-round. These options were dismissed because limiting the treatment of non-native invasive plants to the regional growing season would unnecessarily restrict the parks' application of treatment methods.
- An alternative that would prioritize the treatment of non-native plants that primarily impact forested areas. This alternative was dismissed from further consideration as it was determined that it would unnecessarily limit parks in the treatment of non-native invasive plants that impact other resources in NCR parks.
- Alternatives that would establish short-term (1 to 3 years) or longer-term (3 to 5 years, beyond 5 years) goals for the implementation of non-native invasive plant methods in the NCR. Such alternatives were dismissed from consideration as they would unnecessarily restrict the flexibility of the NCR parks in applying the necessary treatment methods.
- An alternative that prioritized the treatment of non-native invasive plant species by their abundance throughout the NCR. It was determined that conditions with regard to non-native invasive plant species vary widely throughout the NCR and that such an approach would limit the flexibility of the parks in applying treatments. Therefore, this alternative was dismissed.
- An alternative that would prioritize the treatment of non-native invasive plant species by their presence in high-value areas of each NCR park. This was dismissed because conditions with regard to non-native invasive plant species vary widely throughout the NCR and such an approach would limit the flexibility of the parks in applying treatments.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

DO-12 requires the NPS to identify the environmentally preferable alternative in its EAs as well as in Environmental Impact Statements (EIS). The NPS looks to the CEQ's Quality's NEPA's Forty Most Asked Questions, which defines the environmentally preferable alternative as the alternative "that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

After completing the environmental analysis, the NPS identified the selected alternative as the environmentally preferable alternative because it best meets the definition established by the CEQ. Relative to the No Action Alternative, the selected alternative, by providing a unified strategy for the treatment of non-native invasive plants that includes the full range of available treatment strategies and a consistent approach, allows for more effective control of non-native invasive plant species, with beneficial impacts on natural and cultural resources at the NCR parks and minimal adverse impacts on the biological and physical environment.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. The NPS will implement the treatments and methodologies described in the IPMP using Best Management Practices (BMPs) to help ensure protective measures are being properly implemented and are achieving their intended results. A subset of BMPs are listed below (a complete listing is contained in the IPMP):

- Apply herbicides at the appropriate time based on the herbicide's mode of action.
- Apply herbicides according to application rates specified on the product label.
- Conduct herbicide applications in a manner that minimizes impact on non-target sensitive resources and reduces the risk of human exposure.
- When applying herbicide, take into account meteorological factors such as wind speed, wind direction, inversions, humidity, and precipitation in relation to the presence of sensitive resources near the treatment area and the directions provided on labels.
- In areas where there is potential to affect surface water or groundwater resources, consider herbicide pH and soil pH to select the herbicide with the least leaching potential.
- In areas where there is potential to affect surface water or groundwater resources, apply only herbicides approved for use in and around aquatic environments.
- Apply herbicides with high volatility only during weather conditions that reduce volatilization risk.
- Follow safety protocols for storing, mixing, transporting, handling spills, and disposing of unused herbicides and containers at all times.
- During all chemical applications, control droplet size to decrease the risk of herbicide drift to non-target species outside the immediate treatment area.
- Consult with NPS cultural resource specialists to determine if cultural resources are present in areas proposed for invasive plant species treatment or if the area needs to be surveyed for cultural resources prior to work being done.
- Train field personnel to recognize and avoid threatened, endangered, and candidate species in their work sites and travel routes and provide them with information on locations of known habitats for listed or candidate species.
- Before starting work at a site, instruct staff on any known or suspected rare species; training will include looking at pictures or the species itself.
- If federally listed or candidate species occur in the action area, consult with the US Fish and Wildlife Service (USFWS) prior to any action.
- Revegetate and/or mulch disturbed soils as soon as possible to reduce the likelihood of invasive plant reestablishment.
- Select plants for revegetation based on soil conditions, site hydrology, and shade tolerance.

- Select species for revegetation that provide a range of flowering and fruiting times to maximize wildlife habitat.
- In areas of high erosion potential, seed with weed-resistant species.
- Encourage passive regeneration of native species present in the seedbank.
- Carefully consider, and mitigate to the extent possible, the potential for plantings to introduce new soil and plant pathogens as well as other invasive species.
- When possible, protect revegetation areas from deer and other damaging wildlife. When possible, assist plant establishment with techniques such as irrigation and mulching.

Why the selected alternative will not have a Significant Effect on the Human Environment

As documented in the EA, the NPS has determined that the selected alternative, Alternative 1, can be implemented without significant adverse effects. As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an EIS: Vegetation, wildlife, and visitor use and experience will experience both beneficial and adverse impacts; none of the adverse impacts would be significant and require analysis in an environmental impact statement (EIS).

Vegetation: Some of the treatment methods included in the selected alternative may result in short-term adverse impacts to non-target vegetation: chemical methods may result in overspray, especially if aerial application methods are used; physical methods may unavoidably require the destruction of some or all non-target species within the treatment area. Unavoidable impacts would be minimized by conducting all treatments in compliance with the relevant BMPs defined in the IPMP. These impacts would be limited in extent and duration, and range from negligible to minor. They would not be significant and would not require preparing an EIS. Long-term beneficial impacts from the more effective removal of non-native invasive species and promotion of native species would largely offset these short-term adverse impacts.

Wildlife: With the exception of biological methods, which are highly species-specific, and manual methods, all treatment methods under the selected alternative could have negligible to minor adverse impacts on those wildlife species making use of the area being treated. Unavoidable impacts would be minimized by conducting all treatments in compliance with the relevant BMPs defined in the IPMP. These impacts would be limited in extent and duration - as wildlife would return to the site after the treatment is complete. They would not be significant and would not require preparing an EIS. Long-term beneficial impacts to native wildlife from the more effective removal of non-native invasive plant species and promotion of native species would largely offset these short-term adverse impacts.

Visitor Use and Experience: Treatment of non-native invasive plant species under the selected alternative may result in adverse impacts on visitor use and experience by restricting access to the park areas being treated. The intensity of such impacts would vary with the park and the areas being treated, and would range from negligible to minor. In all cases they would end when access restriction are lifted. Unavoidable impacts would be minimized by conducting all treatments in compliance with the relevant BMPs defined in the IPMP. These adverse impacts would not be significant and would not require preparing an EIS. In the long term, more efficient removal of invasive plant species would enhance the ecological and visual quality of the parks, resulting in beneficial impacts on visitor use and experience that would largely offset the short-term adverse impacts.

Degree of effect on public health or safety: NPS policies promote a safe work environment for employees and a safe experience for park visitors. The equipment that will be used to implement the treatment options included in the IPMP, such as hand tools, chainsaws, portable sprayers, and utility task vehicles (UTVs), are standard devices commonly used in the parks. Training on the proper use of equipment is required under NPS policy. Safety protocols for storing, mixing, transporting, handling spills, and disposing of unused herbicides and containers are described on the EPA-approved

manufacturer labels. These protocols will be followed in all cases. For an herbicide to be approved, the EPA conducts rigorous analysis of all the scientific studies and considers all public comments. Herbicides used by NPS show very low risks according to health risk assessments, supporting a determination that the pesticide's use, as approved and according to manufacturer label, will cause no health risks to humans. At a minimum of every 15 years, the EPA reviews all registered products, which includes evaluating new information and data on each product. The BMPs listed in the IPMP will further protect the public from accident and injury. In particular, signage will be put in place to prohibit unauthorized persons from accessing areas under treatment (including, as needed, a buffer in the case of aerial spraying). Therefore, the selected alternative has no potential to have measurable impacts on human health and safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas: The selected alternative has no or minimal potential to noticeably affect soils (including prime farmland), wild and scenic rivers, ecologically critical areas, or significant ethnographic resources.

The NPS conducted a programmatic assessment of the potential effects of the IPMP on historic properties and found that the potential for adverse effects is minimal. Each treatment action will be further reviewed in accordance with the 2008 Programmatic Agreement (PA) for the Operation, Management, and Administration of the National Park System.

On April 7, 2016, the NPS sent letters to the State Historic Preservation Offices (SHPOs) of Maryland, Virginia, West Virginia, and the District of Columbia proposing that, based on the above considerations, the IPMP would not result in adverse effects on historic properties. Concurrence with this finding has been received from the District of Columbia SHPO (letter dated April 27, 2016), Maryland SHPO (letter dated April 27, 2016), Virginia SHPO (letter dated April 28, 2015 [read 2016]) , and West Virginia SHPO (letter dated May 11, 2016).

The selected alternative will have no adverse impacts on unique characteristics of wetlands or floodplains. Only herbicides approved for aquatic use will be applied in wetlands, marshes, floodplains or similar aquatic environments. Any pollution associated with stormwater discharges will be minimized through coverage under a General Permit for Construction Activities (i.e., sediment erosion control), as applicable. As part of coverage under this permit, BMPs will be identified that reduce or prevent untreated runoff from directly discharging into water bodies. Additionally, any erosion impacts resulting from land disturbance or vegetation removal will be very small, further reducing the risk of pollution. In accordance with each herbicide's EPA-accepted label, applications will be planned with attention to the weather and parks will avoid applying herbicide when rainy weather is anticipated, thus limiting the risk of the product migrating to nearby bodies of water via stormwater runoff.

While the selected alternative has some potential to affect the capacity of floodplains to store flood waters through the removal of surface vegetation, such potential impacts will be so small as to be negligible. In most cases, treatment of non-native invasive plants will be localized and affect relatively small areas. In the immediate short term, processes like interception, transpiration, and evaporation will be modified but this will be quickly offset by re-vegetation. Appropriate BMPs will be implemented by resource managers in the unlikely case vegetation removal activities are thought to be reaching a level that would result in significantly altering the local floodplain storage capacity (e.g., removal of larger trees.) Further, in all cases, but especially in the case of treatment by aerial spraying, which will generally affect greater areas than other treatment actions, parks will further plan their actions with attention to the weather and avoid conducting them when the risk of flooding is increased by ongoing or predicted weather events at or upstream of the treatment site (e.g., significant rain storm or quick melting of large snowpack).

Degree to which effects on the quality of the human environment are likely to be highly controversial: No highly controversial effects were identified, in terms of scientific uncertainties, as a result of the preparation of the EA or by the public during the public scoping and public comment periods.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: No highly uncertain, unique, or unknown risks were identified during the preparation of the EA or through the public scoping or public comment periods.

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 does not establish a precedent for future NPS actions with significant effects. It does not represent a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts: The selected alternative will have no or barely perceptible effects on the following: soils; air quality; water quality; species of special concern; floodplains; human health and safety; environmental justice and the protection of children; energy resources; and climate change. Therefore, when considered along with past, present, and reasonably foreseeable projects, it has no potential to result in cumulative impacts.

Vegetation: The collective impacts on native vegetation of past, present, and reasonably foreseeable projects in the NCR are generally adverse, as they cumulatively result in a loss of habitat. The selected alternative will have long-term beneficial impacts on native vegetation at NCR parks, which will partially offset those adverse impacts. Thus, the selected alternative will have beneficial cumulative impacts on vegetation.

Wildlife: Similarly, the collective impacts on wildlife of past, present, and reasonably foreseeable projects in the NCR are generally adverse, as they cumulatively result in a loss of habitat. The selected alternative will have long-term beneficial impacts on wildlife at NCR parks, which will partially offset those adverse impacts. Therefore, it will result in beneficial cumulative impacts on wildlife.

Cultural Resources: The selected alternative will have no adverse impacts on cultural resources. Therefore, when considered along with past, present, and reasonably foreseeable projects, it will result in no cumulative impacts.

Visitor Use and Experience: Past, present, and foreseeable park projects in the NCR are intended to improve the parks and, thus, result in long-term beneficial impacts to the quality of the visitor experience. A partial exception is those visitors who might object to some management measures. But such impacts are most likely offset by the enhanced experience of other visitors who enjoy the improvements to landscape and other park elements resulting from better management of nuisance species. Non-park general construction and landscape projects near parks can potentially adversely affect visitor experience through increased development, noise, or visual clutter. The selected alternative will have long-term beneficial impacts on visitor use and experience, which will partially offset any adverse impacts from other projects. Thus, when considered with other past, present, and reasonably foreseeable future projects, it will result in beneficial cumulative impacts.

Parks Operations and Management: Past, present, and foreseeable future park projects in the NCR generally have an adverse impact on park operations and management because of the need for park personnel to manage, monitor, or execute the projects, which increases the demand on the park staff's time. Most of those adverse impacts are short-term and either decrease or disappear in the long term, however. Some non-park projects also can potentially have adverse impacts on park operations and management, by requiring specific actions from parks. The selected alternative will have beneficial long-term impacts on park operations and management, partially offsetting those adverse impacts. Therefore, when considered with other past, present, and reasonably foreseeable future actions, it will result in long-term beneficial cumulative impacts on park operations and management in the NCR.

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 have no adverse impacts on districts, sites,

highways, structures, or objects listed on National Register of Historic Places or cause loss or destruction of significant scientific, cultural, or historical resources. The NPS conducted a programmatic assessment of the potential effects of the IPMP on historic properties and found that the potential for adverse effect is minimal. Each treatment action will be further reviewed in accordance with the 2008 PA for the Operation, Management, and Administration of the National Park System. On April 7, 2016 the NPS sent letters to the SHPOs of Maryland, Virginia, West Virginia, and the District of Columbia proposing that, based on the above, the IPMP would not result in adverse effects on historic properties. Concurrence with this finding has been received from the District of Columbia SHPO (letter dated April 27, 2016), Maryland SHPO (letter dated April 27, 2016), Virginia SHPO (letter dated April 28, 2015 [read 2016]) , and West Virginia SHPO (letter dated May 11, 2016).

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: The selected alternative will have no measurable adverse impacts on rare, threatened, or endangered species. Impacts will be avoided by conducting all treatment actions in accordance with the applicable BMPS listed in the IPMP. The NPS has consulted with USFWS on the IPMP. Informal consultation correspondence was sent on March 31, 2015 to the USFWS West Virginia Field Office. On March 31, 2015, the West Virginia Field Office responded with a finding of No Effect/Not Likely to Adversely Affect. Informal consultation correspondence was sent on March 17, 2016 to the USFWS Virginia Field Office and Chesapeake Bay Field Office for Maryland and the District of Columbia. On May 6, 2016 the Chesapeake Bay Field Office responded with a finding of No Effect/Not Likely to Adversely Affect for both Maryland and the District of Columbia. On April 4, 2016 the Virginia Field Office responded with new instructions for environmental review using their website. A follow-up Self Certification Letter was submitted by the NPS on May 2, 2016 per the instructions on the Virginia Field Office's website.

Whether the action threatens a violation of federal, state, or local environmental protection law: The selected alternative violates no federal, state, or local environmental protection laws. The IPMP is consistent with all laws, regulations, and requirements.

PUBLIC INVOLVEMENT

Public involvement in this proposal included public scoping during the EA process and a public review of the EA. The public was invited to comment during initial public scoping, which occurred from May 11, 2015 to June 10, 2015. A scoping courtesy letter describing the IPMP/EA and soliciting comments was mailed to 32 agencies and 132 individuals. The letter directed individuals and agencies to the project page on the NPS Planning, Environment and Public Comment (PEPC) website, where they could learn more about the project and submit comments. A scoping newsletter and press release providing additional information on the project were also posted to the PEPC website.

Comments received focused on existing vegetation resources, impacts of invasive plants, suggestions for new alternatives or elements to consider, and environmental and public health concerns. NPS considered all scoping comments in the preparation of the EA. Key issues identified during the scoping process are summarized below.

Alternative / Alternative Element Suggestions: Comments suggested ways to select areas for treatment, including identification of biologically significant areas at risk and use of a decision analysis tool; specific geographic areas that should be given priority; and treatment methods.

Natural Resource Issues: Comments focused on environmental health concerns related to herbicide use and questioned whether there are long-term benefits to herbicide use and whether damage would occur to soils and wildlife. Natural resource concerns were also expressed over the impact of invasive plants and the potential to alter and destroy habitat, which require early detection and mitigation to protect agricultural and natural resources.

Visitor Use and Experience: The comments centered on public health concerns related to herbicide use, in particular regarding the use of chemicals near highly used portions of Rock Creek Park, around both people and animals.

Support and Opposition to Alternatives/Project Elements: Comments were received both in support of and in opposition to the alternatives. Supporting comments were in reference to the overall concept of invasive plant management, the prioritization of non-native, invasive vegetation treatment, and the treatment of invasive plans prioritized by area. Comments in opposition were in reference to maintaining the status quo; prioritization by species, which could have minimal beneficial impacts and/or could fail; and selective removal of a species, which could allow other invasive species to replace them.

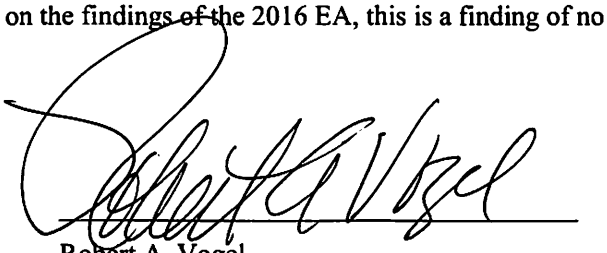
During the EA review process, the NPS received input from six individuals and organizations. NPS responses to these comments are attached. The NPS considered the comments it received and those comments that resulted in changes or additions to the EA are contained in the errata section below. The comments prompted no changes to the selected alternative or the impact analysis.

CONCLUSION

The NPS has selected Alternative 1 for implementation. The impacts that result from the selected alternative will not impair any park resources or values necessary to fulfill specific purposes identified in the relevant enabling legislation. The selected alternative does not constitute an action that normally requires preparation of an EIS. The selected alternative will not have a significant effect on the human environment. The selected alternative will have no or barely perceptible effects on the following: soils; air quality; water quality; species of special concern; floodplains; human health and safety; environmental justice and the protection of children; energy resources; and climate change. There will be no significant impacts to vegetation; wildlife; cultural resources; visitor use and experience; and park operations and management. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental law.

Based on the foregoing, it has been determined that an EIS is not required for this action and thus will not be prepared. Based on the findings of the 2016 EA, this is a finding of no significant impact.

Approved:



3-9-16

Robert A. Vogel
Regional Director
National Capital Region

Date

ERRATA SHEET

This Errata Sheet contains clarifications for and corrections to the 2016 National Capital Region - Invasive Plant Management Plan/EA. The following changes do not alter the analyses in the EA.

COMMENTS

Comment #	Commenter	Affiliation/Address	Comment	Response
55424-72611-2	Nick Yoder	Sierra Club, MD Chapter	"Allegheny County" in Table 4-1 should be spelled "Allegany County."	In Table 4-1 of the IPMP/EA, "Allegheny County" should be read to refer to Allegany County, MD.
55424 72611-6	Alli Baird	VA Department of Conservation and Recreation	New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information is the scope of the project changes and/or six months has passed before it is utilized.	The following item should be added to the "Project Planning Checklist" box in Figure 2-1 of the IPMP/EA: *Coordinate with VA DCR for up-to-date information from the Biotics Data System.*
55424 72611-6	Alli Baird	VA Department of Conservation and Recreation	Tables of Natural Heritage resources in Virginia parks provided with the comment include many species not found in Appendix B of the IPMP/EA.	The tables provided with the comment should be added to Appendix B of the IPMP/EA.
55424 72611-5	Alan Cohen	Safe Grow Montgomery	Herbicide treatment Methods: BMP should include effects on soil microbiota.	In Table 1-1 insert "(including soil biota)" after "on soils"
"	"	"	"	In Table 1-1 remove ", persisting for up to two years"
"	"	"	"	In Table 1-1 replace "with no long-term adverse impacts" with "with no known long-term adverse impacts"
N/A	N/A	N/A	The EA cover is dated May 2015	The date should read May 2016.