



# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
1011 East Tudor Road  
Anchorage, Alaska 99503



In Reply Refer to:  
FWS/IR11/FES

## FINDING OF NO SIGNIFICANT IMPACT

### Proposed Project Title

Management Strategy for Elodea and Other Submersed Aquatic Invasive Plants in the Alaska Region

### Summary

The U.S. Fish and Wildlife Service (Service), proposes to restore and maintain the native natural diversity of aquatic systems within the Alaska Region (Region) by managing two *Elodea* species that have infested parts of Alaska and three other submersed aquatic invasive plants that have not yet been found in the Region. However, they pose an equal threat as elodea and can be managed by the same means. The Programmatic Environmental Assessment (EA) attached to this document analyzes the consequences of the following five alternatives: A) no action; B) cultural control; C) physical control; D) chemical control; and E) the preferred alternative – utilization of an Integrated Pest Management (IPM) strategy. We chose the preferred alternative over the other alternatives. 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

In 2014, the State of Alaska placed five submersed aquatic invasive plant species on the State's quarantined plant list due to the plants' potential impacts to native species and human activities. Two of these species, *Elodea Canadensis* and *Elodea nuttallii* (elodea hereafter), have become established or eradicated in small, localized areas of Interior Alaska, the Susitna River Basin, the Kenai Peninsula, and the Anchorage Municipality. Elodea has also become established in the Copper River Delta and a few waterbodies have been treated under the leadership of the US Forest Service. The other three quarantined species include *Egeria densa* (Brazilian waterweed), *Hydrilla verticillata* (hydrilla), and *Myriophyllum spicatum* (Eurasian watermilfoil). These three species have not been detected in Alaska, but they represent a similar threat as elodea to native species, as well as subsistence and recreational activities in the Region. These plants can spread quickly and negatively impact aquatic systems when they become established outside their native range. Since 2010, the Service, the Alaska Department of Natural Resources (ADNR), and other partner organizations have been working together to minimize the impacts of elodea infestations and raise awareness of the potential harm to native species and human activities. The detrimental impacts of these submersed aquatic invasive plants are further discussed in the

Programmatic EA. The purpose of the proposed action is to prevent further negative impacts and restore infested waterbodies to their more natural condition throughout the Region.

According to the National Environmental Policy Act (NEPA), Federal agencies must prepare and consider alternatives to major Federal actions that may significantly affect the quality of the human environment, and ensure that environmental considerations are evaluated in the decision making process.

The attached Programmatic EA evaluates the Service's Region-wide submersed aquatic invasive plant management strategy. Using the analysis in the Programmatic EA and lessons learned from previous invasive aquatic plant management actions in the Region, the Service has developed a management strategy that minimizes risks to the environment and human health while accomplishing management goals. The proposed action is also related to the Service's goal to prevent the introduction of new invasive species and control invasive species that are here presently.

### **Summary of Preferred Alternative**

Alternative E, the IPM strategy, is the preferred alternative to manage the previously identified invasive submersed aquatic plants. The IPM strategy is defined as a sustainable approach to managing pests by combining biological, cultural, physical, and chemical control methods in a way that minimizes risks to the environment and human health. At this time, a biological control method is not an available tool. This IPM strategy will be used on Service administered land as well as on projects using Service funds, but occurring off of Service administered land. The Service and our partners have achieved localized eradication of elodea in Alaska by applying the IPM strategy to infested water bodies since 2015.

### **Public Involvement**

The Service selected a combination of internal and targeted 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 that may have jurisdiction by law, entities with special expertise, and entities that may be affected by management actions to provide a broader perspective on relevant issues. We also included entities that may have an interest in submersed aquatic invasive plant management actions. These entities were identified based on interest in previous Service invasive species control efforts in the Alaska Region.

The Service sent initial scoping letters to potentially interested parties in November of 2019, notifying them the Service was analyzing the effects of implementing management strategies for elodea and the other submersed aquatic invasive plants in the Region. In total, scoping invitation letters were sent to 28 entities (a list of entities contacted is included in the Programmatic EA). Of the 28 entities that received an invitation, 12 responded. The 12 responses varied in content, but all were supportive of the Service's general purpose and need of the proposed action. Two responses indicated the recipients had no comment at this time. Three responses were generally supportive of management actions, but did not comment on scope. The remaining seven responses provided comments on the scope of analysis, action alternatives, or the NEPA process. Some responses identified the importance of chemical control and timely action in successful

elodea eradication efforts. Other responses identified the importance of a careful analysis of human health and ecological effects of herbicide use. Consideration of a combination of management techniques including cultural, physical and chemical methods was also suggested.

The following entities requested to be cooperating agencies as defined by the Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR 1501.6): the ADNR and Joint Base Elmendorf – Richardson's Natural Resources Program.

Potentially interested entities had the opportunity to provide comments on the Draft Programmatic EA during a 14-day interested entity comment period, January 28 through February 10, 2020. Three comment letters were received. Substantive comments were addressed in the Draft Programmatic EA and the FONSI was revised accordingly.

The Service invited Tribal leaders from the Alaska Region to provide comments on the Draft Programmatic EA on February 6, 2020. Invitation letters were sent to all 227 entities on the Bureau of Indian Affairs Alaska Region Tribal Leader Directory. No substantive responses have been received as of March 19, 2020.

The public was given an opportunity to provide comments on the Draft Programmatic EA and Draft FONSI during a 15-day public comment period, March 5 through March 19, 2020. One comment was received during the public comment period. The comment identified a non-technical stylistic issue concerning selected text in the document. No comments were submitted regarding the technical content of the document. The 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 E has been selected as the preferred alternative. Alternative E is the sustainable and adaptable approach to managing these aquatic invasive plants. Alternative E uses all available tools to minimize risk to human health and the environment. Alternative E provides decision makers flexibility in selecting appropriate tools to accomplish management goals effectively. Alternative E is also consistent with the Service's mission and Service 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 that are affected by Elodea and possibly other submerged aquatic invasive plants. The implementation of this management strategy will increase the speed of future response actions and will reduce the potential for submerged aquatic invasive plants to spread to habitats elsewhere in the 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.

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 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 enclosed 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.

Copies of the Programmatic EA are available upon request from the Service's Regional Office, 1011 East Tudor Road, Anchorage, Alaska 99503, or from the Service's website at <https://www.fws.gov/alaska/pages/invasive-species>.

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Regional Director  
Alaska Region  
U.S. Fish and Wildlife Service

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Date