



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

March 30, 2020

Shawn Langston
Invasive Plant Control
U.S. Department of Agriculture Forest Service
5218 State Route 414
Hector, New York, 14841

RE: Scoping Comments for the Invasive Plant Control for the Finger Lakes National Forest, Schuyler and Seneca Counties, New York

Dear Mr. Langston:

The U.S. Environmental Protection Agency (EPA) has reviewed the Forest Service's Invasive Plant Control Notice of Proposed Action and Opportunity to Comment for the Hector Ranger District Finger Lakes National Forest dated March 2020. The Finger Lakes National Forest is in the Towns of Lodi and Covert in Seneca County and the Towns of Hector and Burdett in Schuyler County, New York. The purpose of the proposed action is to evaluate a variety of control options for non-native invasive plant species to slow their spread and/or eradicate their presence in the Finger Lakes National Forest. EPA has the following scoping comments:

- The Environmental Assessment (EA) should include a comprehensive evaluation of cumulative, indirect, and secondary impacts. The cumulative impacts analysis should consider the environmental impacts of past, present, and reasonably foreseeable future projects and/or actions in the project area;
- The EA should include any necessary wetlands, cultural resources, or other mitigation plans; and,
- EPA recommends that adequate monitoring and evaluation be included in the EA to determine if the application rates are effective, that any buffers are sufficient, drift is minimized, and specific goals and targets are being met. This includes a commitment to use the best available techniques for monitoring, evaluation, and mitigating the impacts from herbicides, especially if they are known to be persistent or migrate through the soil into groundwater.

Thank you for the opportunity to comment. If you have any questions, please contact Lingard Knutson at (212) 637-3747 or knutson.lingard@epa.gov.

Sincerely,

Mark Austin, Team Leader
Environmental Review Team