

Alamogordo, NM 88311
November 26, 2020

Travis G. Moseley, Forest Supervisor
c/o Peggy Luensmann
Lincoln National Forest Supervisor's Office
3463 Las Palomas
Alamogordo, NM 88310

RE: Public Comment-Integrated Non-Native Invasive Plant Management Project
Draft Environmental Impact Statement

Dear Mr. Travis G. Moseley- Lincoln National Forest Supervisor,

Thank you for providing the public the opportunity to comment on the Integrated Non-Native Invasive Plant Management Project DEIS. Of the 3 Alternatives presented in the DEIS Alternative A-No Action or Alternative C-No Herbicide are preferable. The aerial applications method proposed is of significant concern as well as other potential impacts from this proposed project detailed within the DEIS. The DEIS mentions how repeat applications are often necessary, "some infestations require repeated treatment for 5 to 8 years to ensure effective control or provide containment." With this in mind, I question the effectiveness of herbicide use as the best option for treatment within the forest. The cumulative impact from those reapplications is a potential problem as well.

The DEIS mentions that there are no reports associating exposure to any of the herbicides included within the study with adverse effects in individuals having Multiple Chemical Sensitivity." The lack of reports associating adverse effects due to exposure does not guarantee that adverse effects will not occur due to exposure. There is the potential that even approved chemical agents, believed to be safe, could potentially negatively impact people, animals, and the environment. I also believe there are resources available stating that various herbicides including some listed could potentially have adverse impact to those with Multiple Chemical Sensitivity, as well as other humans.

Any aerial application has the potential to negative impact humans, domestic animals, as well as wildlife, natural resources, and the environment. The list of herbicides within the DEIS for potential use with this project is extensive, and includes Glyphosate. That herbicide has had significant attention in the news for its negative impact on health regardless of its continued usage.

The DEIS states on page 48: "Incomplete and Unavailable Information-In some cases, a risk assessment may find no objective suggestion of an adverse effect based on the currently available data. In such cases, the risk characterization must clearly make the point that: *Absolute safety cannot be proven and the absence of risk can never be demonstrated.* No chemical or other pesticide agent is studied for all possible effects and the use of data from laboratory animals to estimate hazard or the lack of hazard to humans or other species is an uncertain process. Thus, prudence dictates that normal and reasonable care should be taken in the handling of any herbicide (SERA 2014a). This statement is profound and, therefore, further reason to not include pesticide use in this project. Additionally, the cost of this project will be significant and taking into consideration that success is not certain coupled with the potential risks and negative impact to the forest makes the "No-Action Alternative" the intelligent option.

Sincerely,


Dory Schuster

Dorothy Schuster



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