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Comments: I am a plant taxonomist, retired after 30 years in Ohio University's Dept. of Environmental and Plant Biology. For more than 20 years, I have also worked on a volunteer basis with Athens Conservancy, a conservation land trust I helped found, which now owns and manages over 4,700 acres. One of my roles in the organization is preserve stewardship, including invasive plant control.

I understand biodiversity conservation to be part of the stated mission of the USFS, with emphasis on protection of state- or federally listed endangered species. However, conserving biodiversity requires more than just protecting the rarest species. Species that are uncommon should be protected as well, to avoid their slipping into rarity. I understand this is the function of designating Regional Forester Sensitive Species (RFSS), but very few RFSSs have been designated in Wayne National Forest. For example, Guyandotte beauty (*Synandra hispidula*) occurs in the Eels Run area of WNF and is very uncommon in the state as a whole but is not included on the Regional Forester Sensitive Species list for the Wayne (RFSS_2023_24_Official_Final_list_508.pdf).

For the most part, Athens Conservancy controls invasive plants in its preserves through a combination of manual removal of non-native herbs and low shrubs, and direct application of triclopyr to the bark of tree trunks (*Ailanthus* and *Paulownia*) and cut stems of taller shrubs (e.g., *Euonymus alatus* and *Lonicera maackii*) and vines (*Celastrus orbiculatus* and *Euonymus fortunei*). We avoid foliar spray because damage to nontarget native plants is inevitable. In the only exception to date, we are using foliar spray on a small, isolated patch of a highly invasive herb, lesser celandine (*Ficaria verna*), which was discovered in one of our preserves in 2024 by a retired USFS forester. After attempting unsuccessfully to dig it out completely last spring, we determined that the only way to eradicate it is with a foliar herbicide application. In this situation, we decided that the damage to nearby native herbs, none of which are uncommon, is justified in order to prevent far greater damage to the herb layer if lesser celandine is allowed to spread in that preserve.

I urge the USFS to apply similar caution in Wayne National Forest. In my view, the Non-Native Invasive Plant Control EA does not give sufficient consideration to protecting uncommon non-target plants from damage due to foliar spraying. Specifically, I urge WNF to explicitly limit the use of foliar spray to the eradication of isolated colonies of seriously invasive species such as lesser celandine that will definitely harm biodiversity if ignored, and which can't be eradicated either manually or through direct application of herbicide to trunks or cut stems.

The EA should state this restriction explicitly in order to avoid the temptation to use foliar spray unnecessarily, just because it takes less time than basal bark application or manual removal.