

Ashley Babcock, [REDACTED]
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Travis G. Moseley, Forest Supervisor
c/o Peggy Luensmann
Lincoln National Forest

Re: Mr. Moseley and Ms. Luensmann,

My name is Ashley Babcock, and I am a [REDACTED]
[REDACTED]. I am writing to comment on
the Draft Environmental Impact Statement (DEIS) for Lincoln National Forest's Integrated
Non-Native Invasive Plant Management Project.

This letter voices my opinion that non-native invasive species need management on some
level and that integrating multiple management strategies, including traditional practices, is the
best option for the future. I am in favor of Alternative C, as I do not approve of applying
chemical herbicides as a management strategy.

In this letter, I comment on the positives and negatives of the DEIS as I see them. I voice
support for amending the 1986 Forest Plan for flexibility to adapt with long-term condition
optimization, but only if it allows for equitable representation of all constituent interests. At the
end, I recommend including prescribed burn into the portfolio of multi-faceted approaches of
Alternative C, and I share some concerns that the public involvement process may not fully
represent all constituents.

Positives and Negatives of DEIS

Alternative C is the best alternative in this plan. “Non-treatment elements (prevention, education, inventory, monitoring, and cooperative partnership strategies)” (p. iii, 77, 103, 197) seem to be the safest and least harmful way to proceed with managing non-native invasive plant species. I appreciate that Alternative C:

“includes a range of treatment methods including options to use a combination of methods on the same site. The amount of manual, mechanical and biological treatments would increase, compared to the proposed action [Alternative B]. [Alternative C] also includes an adaptive management strategy designed to effectively treat new infestations as they are detected and to incorporate new technology, excluding herbicides, as it becomes available” (p. iv, 88).

Because forest management is so complex, it is appropriate for management to have multiple approaches.

My concern about Alternative B is that applying chemical herbicides will cause more damage than rectification. The DEIS states that “people who are hypersensitive to chemicals in the environment may be inadvertently exposed to and adversely affected by herbicide residues if they use the localized sites where an herbicide has been applied” (p. iv, 38, 42, 52, 57) on five different occasions. What this wording says to me is that the chemicals are dangerous to health. Thus, it is clear that there are adverse effects to humans and thereby the ecosystem as well. To assert that “adverse health risks are not expected with Alternative B which does include the use of herbicides” (p. iv) is therefore contradictory. Applying herbicides by aerial application brings to mind footage from the mid-1900s of school kids eating lunch while an airplane sprays now-banned chemicals onto nearby crop fields. I am concerned that opening the door to chemical utilization as a management practice will encourage other land managers to incorporate

this toxic method in future projects; it will be better in the long term to take a less harmful approach.

In regards to Forest Plan Amendment 19, I am in favor of an amendment that will better allow land managers to adapt. I appreciate that, “this amendment would incorporate new or modified U.S. Fish and Wildlife direction to protect federally listed or candidate species that may be impacted by the project” (p. iv, 24). However, I do not support amending the 1986 Forest Plan to include the use of herbicides, nor do I support removing language from the existing Plan that makes protection of threatened and endangered species more vague.

Thoughts on an additional alternative - prescribed burn:

The United States Forest Service (USFS) initially considered but then discarded prescribed burns as an alternative, but I would like to encourage you to reconsider incorporating it into the plan. There are other considerations USFS would need to address if incorporating this technique. In order to successfully use fire as a management tool, the agency needs to consider the use of fire for additional reasons, including fuel management and habitat restoration. Future analysis of prescribed burning as a forest management tool, and all its benefits when used respectfully, is recommended. Overall ecosystem health can be encouraged using a holistic view.

Relatedly, the extent the USFS incorporated Native American land management techniques¹ is unclear. When the USFS considers traditional management of the land, they will

¹ Indigenous Americans have lived in the Western US Region for over 10,000 years. European settlers moved westward in the 1800s, most notably after the Civil War on the East Coast between North and South. An era of Manifest Destiny, homesteading, and Anglo/Western farming and ranching practices ensued. Slowly and painfully, Native Americans were forcibly removed from traditional homelands. The United States Forest Service was established in 1905. The imbalance of invasive plant species is mirrored in racial and ethnic social consequences, and fixing the imbalance requires land reparations and honoring traditional practices with Native Americans.

find that prescribed burns is a viable management option. One example of a successful Federal public land and Native Nation collaboration is found in California. Yurok Nation consults with USFS, advising about burning techniques consistent with traditional practice over centuries (Sommer, 2020).

Native American values and management techniques align with the direct objectives of the USFS, “Caring for the Land and Serving People.” Coordinating what that means to all stakeholders is essential in order for the governmental agencies to represent all constituents. Therefore, it behooves the USFS federal agency to incorporate and encourage traditional land management practices of Native Americans into management over the long term into the future. It seems that applying chemical herbicides is not a traditional practice for the health of the native ecosystem, and this less invasive management tool can be tried first.

Thoughts on Public Involvement strategies:

The public involvement process of this Draft Environmental Impact Statement (DEIS) has benefits and limitations. At least two Schedule of Proposed Action (SOPA) listings were posted, one in 2010 and one in 2018. These listings are available on the internet, so anyone with internet and computer access, and reading ability, could learn about this plan. In 2018, the SOPA listed a direct contact for project information. To cast a wider net for this public involvement method, USFS may require running advertisements about the proposed action or facilitating education about how to find information on the agency website. This option, to email a USFS contact, is available to a broader range of constituents than the scoping letter option.

The USFS also mailed two rounds of scoping letters to 400 and 250 stakeholders and constituents, in 2010 and 2016 respectively. The Distribution List (see Appendix A at the end of

this document), indicates a variety of stakeholders to whom the DEIS was sent. The USFS selected to whom they sent the mailings, soliciting feedback from ranchers, oil and gas corporations, municipalities and Native American groups. Thus, individuals have a barrier to accessing this public involvement process, and solicitations are available only for respondents who receive mail. For some reason, the second mailing in 2016 only included about half the recipients. The pool of respondents may be limited, representing government and corporate interests more than the population as a whole.

In addition to mailing a scoping letter and posting a SOPA announcement, USFS could include other forms of public involvement for this project, thereby collecting a wider variety of opinions. It might be effective, due to the site-specific nature of this issue, for the USFS to hold a town hall meeting or open house, for people who live near the Lincoln National Forest. Working through the same challenge of reaching a wide variety of constituents, USFS would need to find a way to boost attendance at those meetings, engaging a variety of stakeholders in order to get the best feedback. One on one meetings, where quieter stakeholders can meet in a more comfortable environment is worth considering, however, some residents may not feel comfortable meeting an official with a uniform. Like the “integrated” proposed action, integrating multiple public involvement initiatives can help collect the most accurate representation of stakeholder opinions.

Ultimately, I am in favor of integrated management of non-native invasive species without the use of chemical herbicides. I approve of an “integrated weed management strategy [that] includes prevention, early detection and rapid response, control and management, restoration, and organizational collaboration. The integrated weed management strategy includes

different levels of management designed for eradication, containment, control or suppression of NNIP infestations" (p.iii). Holistic design will allow for long-term success. I am in favor of flexible management in the future, so I approve of amending the 1986 Forest Plan. However, the amendment must ensure that the Forest Plan include interests from a wide variety of stakeholders, especially Native Americans, and that corporate interests be equitable with other interests. I recommend considering prescribed burn instead of chemical herbicides for faster action and reaching a broader audience in the public involvement process moving forward.

Thank you for providing a detailed and well-thought-out DEIS and for taking the time to read my feedback.

Sincerely,

Ashley Babcock

References

- Sommer, L. (2020, August 24). To manage wildfire, California looks to what tribes have known all along. *NPR: Environment*. Retrieved September 13, 2020 from <https://www.npr.org/2020/08/24/899422710/to-manage-wildfire-california-looks-to-what-tribes-have-known-all-along> .
- Our History*. (n.d.). United States Forest Service. Accessed on October 31, 2020 from <https://www.fs.usda.gov/learn/our-history> .