

**Redwood National Park**

**Santa Monica Mountains National Recreation Area**

California

National Park Service  
U.S. Department of the Interior



# **PUBLIC SCOPING COMMENT SUMMARY REPORT**

## **Invasive Plant Management Plan and Environmental Assessment Redwood National Park and Santa Monica Mountains National Recreation Area**

**January 2014**



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## TABLE OF CONTENTS

Chapter	Page
<b>I. INTRODUCTION AND GUIDE .....</b>	<b>1-1</b>
1.1 Public Scoping Process Summary .....	1-1
1.2 Nature of Comments Received .....	1-2
1.3 The Comment Analysis Process .....	1-2
1.4 Definition of Terms.....	1-3
1.5 Methodology .....	1-4
1.6 Guide to this Document.....	1-5
<b>2. CONTENT ANALYSIS REPORT.....</b>	<b>2-1</b>
<b>3. PUBLIC SCOPING COMMENT SUMMARY .....</b>	<b>3-1</b>

---

## TABLES

	Page
2-1 Correspondence Distribution by Code .....	2-1
2-2 Correspondence by Organization Type.....	2-2
2-3 Organizations Represented in Correspondences.....	2-2
2-4 Correspondence Distribution by Correspondence Type .....	2-2
2-5 Correspondence Distribution by Country.....	2-3
2-6 Correspondence Distribution by State.....	2-3

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## APPENDICES

A	All Correspondence Received
B	Correspondence Received from Organizations

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## ACRONYMS AND ABBREVIATIONS

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Full Phrase

EA	environmental assessment
IPMP	invasive plant management plan
NEPA	National Environmental Policy Act
NPS	National Park Service
PEPC	Planning, Environment, and Public Comment
US	United States

# CHAPTER I

## INTRODUCTION AND GUIDE

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The United States (US) Department of the Interior, National Park Service (NPS) is preparing an environmental assessment (EA) and invasive plant management plan (IPMP) for Redwood National Park and Santa Monica Mountains National Recreation Area. The IPMP will determine how the NPS will move forward with surveying, monitoring, and managing invasive plants in these two California parks.

This report documents the results of the public scoping process for the IPMP/EA. Scoping is a collaborative public involvement process conducted at the beginning of the National Environmental Policy Act (NEPA) analysis to identify and refine issues to be addressed in the EA. Public involvement is a vital part of the NEPA process. In addition to scoping, public involvement for this project includes collaboration with federal, state, and local governments and public outreach efforts.

### **I.1 PUBLIC SCOPING PROCESS SUMMARY**

On August 8, 2013, the NPS released the Public Scoping Newsletter for the IPMP/EA to the public for review and comment. The newsletter included a description of the project background, the purpose of the plan, the project timeline, and three preliminary alternative concepts. The newsletter was available for public review until October 1, 2013.

The NPS hosted three open houses to provide the public with opportunities to become involved, learn about the project and the planning process, meet the IPMP/EA team members, and submit written comments. The open houses were advertised with news releases, the newsletter, and the project website. Meetings were held near the Santa Monica Mountains National Recreation Area on August 27 and 28, 2013, and near the Redwood National Park on September 18, 2013.

Each scoping meeting began at 6:30 PM with opening remarks and a presentation by NPS staff. Following the presentation, meeting attendees had the opportunity to discuss their interests and concerns with NPS staff in an open house format.

A total of 33 individuals attended the public scoping meetings. The number of attendees at each meeting was as follows:

- Santa Monica Mountains, Conejo Recreation and Park District Community Room, August 27: 9 attendees
- Santa Monica Mountains, Temescal Gateway Park, Woodland Hall, August 28: 21 attendees
- Redwood, Humboldt Area Foundation, Emerson Room, September 18: 3 attendees

Members of the public were able to submit their comments on the project using the following methods:

- Electronically through the NPS Planning, Environment, and Public Comment (PEPC) website
- In person at the public meetings
- By mailing comments to the NPS

## **I.2 NATURE OF COMMENTS RECEIVED**

A total of 30 pieces of correspondence were received during the public scoping period. The topics that received the majority of the comments were related to the preliminary alternatives presented in the newsletter and at the meetings. Most of the commenters suggested new alternatives or elements to be included or excluded in the alternatives.

## **I.3 THE COMMENT ANALYSIS PROCESS**

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision makers and the IPMP/EA Team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- Developing a coding structure
- Employing a comment database for comment management

- Reading and coding of public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves, and designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of codes to statements made by the public in their letters submitted and comments stated at the public meetings. All comments were read and analyzed, including those of a technical nature; those expressing opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who choose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on content of the comment rather than the number of times a comment was received. This report is intended to be a summary of the comments received rather than a statistical analysis.

## **I.4 DEFINITION OF TERMS**

Primary terms used in this document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. It can be in the form of a letter or fax, written comment form, or a comment submitted online using the NPS PEPC website. Each piece of correspondence is assigned a unique identification number in the PEPC system.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It should include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or an opinion debating the adequacy of the analysis.

**Code:** A grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the EA process.

**Concern:** A concern is a written summary of all comments received under a particular code. Some codes were further separated into several concern statements to provide a better focus on the content of the comments.

## I.5 METHODOLOGY

During the comment period for the scoping newsletter, 30 pieces of correspondence were received into PEPC directly or were entered into PEPC for analysis. Each correspondence was read, and specific comments within each correspondence were identified. A total of 94 comments were derived from the correspondences received.

Each comment was given a code to identify the general content of a comment and to group similar comments together. Twelve codes were used to categorize all the comments received. An example of a code developed for this project is *AL5000 Alternatives: Preliminary Alternatives*. In some cases, the same comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea.

During coding, comments were also classified as substantive or non-substantive. A substantive comment is defined in the NPS Director's Order 12 Handbook: *Conservation Planning, Environmental Impact Analysis, and Decision Making* as one that does one or more of the following:

- Question, with a reasonable basis, the accuracy of information presented in the scoping brochure
- Question, with reasonable basis, the adequacy of the environmental analysis
- Present reasonable alternatives other than those presented in the scoping brochure
- Cause changes or revisions in the proposal

As further stated in Director's Order 12, substantive comments "raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive." All comments were read and considered and will be used to help create the alternatives and ultimately the IPMP/EA; however, only those determined to be substantive are typically analyzed for creation of concern statements, as described below. At this stage of the project, all comments were considered to be substantive.

Under each code, all substantive comments were grouped by similar themes, and those groups were summarized with a concern statement. For example, under the code *AL5000 - Alternatives: Preliminary Alternatives*, one concern statement identified was, “Commenters suggested changes to the preliminary alternatives.” This one concern statement captured several comments. Following each concern statement are one or more “representative quotes,” which are comments taken from the correspondence to illustrate the issue, concern, or idea expressed by the comments grouped under that concern statement.

## **I.6 GUIDE TO THIS DOCUMENT**

This report is organized as follows:

**Content Analysis Report:** This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live and the number of letters received from different categories of organizations.

**Public Scoping Comment Summary:** This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public’s comments and have not been edited. Some spelling and grammar errors were not corrected. Representative quotes further clarify the concern statements.

**Correspondence Received:** This report contains copies of the correspondence received from all individuals, groups, and agencies. The correspondence was either received directly into PEPC or via a hardcopy letter that was then transcribed directly into PEPC.



## CHAPTER 2

# CONTENT ANALYSIS REPORT

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The following tables show the distribution of correspondences by how they were coded, who submitted the correspondence, and how the correspondence was submitted.

**Table 2-1**  
**Correspondence Distribution by Code**

<b>Code</b>	<b>Code Description</b>	<b>Correspondences<sup>1</sup></b>
AL4000	Alternatives: New Alternatives Or Elements	19
AL5000	Alternatives: Preliminary Alternatives	10
RF1000	References: General Comments	5
PH4000	Public Health and Safety: Impact of Proposal and Alternatives	5
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	5
PN3000	Purpose And Need: Scope Of The Analysis	5
WQ4000	Water Resources: Impact Of Proposal And Alternatives	3
GA1000	Impact Analysis: Impact Analyses	1
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	1
PN1000	Purpose And Need: Planning Process And Policy	1
CR4000	Cultural Resources: Impact Of Proposal And Alternatives	1

<sup>1</sup> Note: Each correspondence may have multiple codes. As a result, the total number of correspondences may be different than the actual comment totals.

**Table 2-2**  
**Correspondence by Organization Type**

<b>Organization Type</b>	<b>Number of Correspondences</b>
Civic Groups	3
Conservation/Preservation	2
NPS Employee	1
Unaffiliated Individual <sup>1</sup>	24
<b>Total</b>	<b>30</b>

<sup>1</sup>Several unaffiliated individuals identified organizations with which they are associated. These organizations are listed in **Table 2-3**.

**Table 2-3**  
**Organizations Represented in Correspondences**

<b>Organization Name</b>	<b>Organization Type</b>
California Native Plant Society	Unaffiliated individual
Cold Creek Community Council	Civic Group
Environmental Protection Information Center	Conservation/Preservation
House Agricultural Consultants/Coco Ranch	Unaffiliated individual
Las Virgenes Homeowners Federation	Civic Group
Malibu Ag	Unaffiliated individual
Mountains Restoration Trust	Unaffiliated individual
Topanga Creek Watershed Committee	Civic Group
University of California Cooperative Extension	Unaffiliated individual

**Table 2-4**  
**Correspondence Distribution by Correspondence Type**

<b>Correspondence Type</b>	<b>Number of Correspondences</b>
Web Form	17
Park Form	8
Letter	5
<b>Total</b>	<b>30</b>

**Table 2-5**  
**Correspondence Distribution by Country**

<b>Country</b>	<b>Number of Correspondences</b>
United States	30

**Table 2-6**  
**Correspondence Distribution by State**

<b>State</b>	<b>Number of Correspondences</b>
California	30

## CHAPTER 3

# PUBLIC SCOPING COMMENT SUMMARY

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The representative quotes following each concern statement include non-official correspondence from members of organizations who may not be an official representative of the organization or agency; therefore, comments may not represent the views or opinion of the identified organization or agency.

### AL4000 - ALTERNATIVES: NEW ALTERNATIVES OR ELEMENTS

**Concern ID:** 49712

**CONCERN STATEMENT:** Commenters suggested various methods of weed control for NPS to consider.

**Representative Quote(s):**

**Corr. ID:** 2

**Organization:** University of California  
Cooperative Extension

**Comment ID:** 338639

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I would also include a training program and objective (e.g third party) review of your weed management programs.

**Corr. ID:** 11

**Organization:** *Not Specified*

**Comment ID:** 338667

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Please add mine to the chorus of voices opposed to the use of herbicides, pesticides, and other toxic chemicals as a means of combating the spread of invasive and non-native plants.

**Corr. ID:** 15

**Organization:** House Agricultural  
Consultants/Coco Ranch

**Comment ID:** 338694

**Organization Type:** Unaffiliated Individual

**Representative Quote:** We urge NPS to closely look at controlled grazing as an alternative to the use of herbicides especially with (though not by any means only with), under-story vegetation including both annuals and perennials.

**Corr. ID:** 15

**Organization:** House Agricultural  
Consultants/Coco Ranch

**Comment ID:** 338689

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Local residents should be permitted to volunteer

hand labor for selective plant removal and local labor should be employed as needed rather than using herbicides

**Corr. ID:** 21 **Organization:** Cold Creek Community Council;  
Las Virgenes Homeowners Federation

**Comment ID:** 338718 **Organization Type:** Civic Groups

**Representative Quote:** Special attention should be paid to invasion via roadside - county public works seems to introduce new invasives to roadsides - at the very least, could public works be educated/become a partner?

**Corr. ID:** 28 **Organization:** *Not Specified*

**Comment ID:** 338738 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Prescribed fire seems like a good plant management technique.

**Corr. ID:** 29 **Organization:** Topanga Creek Watershed  
Committee

**Comment ID:** 338744 **Organization Type:** Civic Groups

**Representative Quote:** Specifically we propose (I) a thorough re-evaluation of the concepts, facts, and assumptions underlying invasive plant biology, and the abandonment of practices that cannot be impartially demonstrated to be scientifically and operationally valid; and also that any new land management programs, projects, or protocols follow these guidelines:

5) When addressing issues of ecosystem health, recognize that changes in plant populations arise from pre-existing conditions, such as the state of the soil, water, and air. Use precious resources to identify and address these conditions rather than symptomatic changes in plant populations.

6) Pursue vegetation control projects ONLY where ALL of the following conditions are met:

a) the targeted environment is protected from the re-introduction of the same or different undesired plant species;

b) project size is small (less than 1 acre);

c) targeted plant species have been conclusively determined to have no ecological value;

d) non-target species can be effectively protected from harm and risk;

e) a detailed revegetation plan, with full-term funding, is firmly in place;

AND

f) vegetation removal and revegetation can be accomplished without the use of herbicides.

7) Prioritize methods that rely upon local labor.

8) Act in concert with the prevailing ethos of nearby communities

49713

**Concern ID:**

**CONCERN  
STATEMENT:**

Commenters expressed support for a balanced adaptive and integrative approach to invasive plant management that would use all available tools and new tools as they become available.

**Representative  
Quote(s):**

**Corr. ID:** 7 **Organization:** Calif. Native Plant Society

**Comment ID:** 338653 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If new herbicides come on the market, NPS

personnel should be encouraged to test them and use them if they prove effective. That goes for any biological controls that may become available. I believe that NPS should be allowed to use all means necessary to handle invasives on public and non-public lands.

**Corr. ID:** 15

**Organization:** House Agricultural Consultants/Coco Ranch

**Comment ID:** 338699

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Adaptive management is an excellent venue for NPS to develop ecologically healthy methods of habitat restoration.

### **AL5000 - ALTERNATIVES: PRELIMINARY ALTERNATIVES**

**Concern ID:** 49714

**CONCERN STATEMENT:**

Commenters supported or rejected one or more of the preliminary alternatives.

**Representative Quote(s):**

**Corr. ID:** 2

**Organization:** University of California Cooperative Extension

**Comment ID:** 338637

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Of your three proposed alternatives, the one that provides the most options and has as adaptive management as part of the alternative, alternative three, is the most logical choice.

**Corr. ID:** 9

**Organization:** Mountains Restoration Trust

**Comment ID:** 338654

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Alternative Three, an adaptive and flexible plan, will ensure that the most current science and technology, including herbicides, is used to manage invasive plants found in the Santa Monica Mountains.

**Corr. ID:** 16

**Organization:** *Not Specified*

**Comment ID:** 338705

**Organization Type:** Unaffiliated Individual

**Representative Quote:** The alternative 2 in this document should not be an option.

**Corr. ID:** 17

**Organization:** *Not Specified*

**Comment ID:** 338712

**Organization Type:** Unaffiliated Individual

**Representative Quote:** I support Alternative 1, with the addition of the proposal from Alternative 2 for using livestock, preferably goats, or other biological control methods, in limited, specific areas, as the least invasive measure proposed to remove non-native, invasive vegetation.

49715

Commenters suggested changes to the preliminary alternatives.

**Concern ID:**

**CONCERN STATEMENT:**

**Representative Quote(s):**

**Corr. ID:** 6

**Organization:** CA Native Plant Society

**Comment ID:** 338648

**Organization Type:** Unaffiliated Individual

**Representative Quote:** For reasons of public relations, Alternative 2 should say something other than "Aircraft for herbicide application" which may be misunderstood as aerial spraying. Something like "Helicopters to position

applicators".

**Corr. ID:** 17 **Organization:** *Not Specified*  
**Comment ID:** 338707 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** I strongly oppose the proposed aircraft herbicide application in the Santa Monica Mountains National Recreation Area.

#### **CR4000 – CULTURAL RESOURCES: IMPACT OF PROPOSAL AND ALTERNATIVES**

**Concern ID:** 49727  
**CONCERN STATEMENT:** Commenters supported consideration of Native American use and history during the planning process.  
**Representative Quote(s):** **Corr. ID:** 15 **Organization:** House Agricultural Consultants/Coco Ranch  
**Comment ID:** 338690 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** The plan should provide for Native Americans and possibly others to gather plant food and materials.

**Corr. ID:** 15 **Organization:** House Agricultural Consultants/Coco Ranch  
**Comment ID:** 338697 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Native Americans once used the land extensively for the foraging of herbs, food and medicinals. Incorporation of this use is essential for the plan to truly reflect aboriginal conditions.

#### **GA1000 – IMPACT ANALYSIS: IMPACT ANALYSES**

**Concern ID:** 49724  
**CONCERN STATEMENT:** Commenters expressed other concerns related to the impacts of invasive species and their control.  
**Representative Quote(s):** **Corr. ID:** 30 **Organization:** Environmental Protection Information Center  
**Comment ID:** 340301 **Organization Type:** Conservation/Preservation  
**Representative Quote:** Chemicals that may be used in combination and between "active" chemicals and so-called "inert" ingredients/chemicals (including surfactants) can have other, more powerful and largely unstudied and unknown impacts as compared to a single chemical used alone. These impacts are known as "synergistic effects" and they are not addressed on the chemical labels. The particular combinations of chemicals and other ingredients proposed for use and the potential for synergistic effects among these ingredients should be analyzed and disclosed.

#### **PH4000 – PUBLIC HEALTH AND SAFETY: IMPACT OF PROPOSAL AND ALTERNATIVES**

**Concern ID:** 49717  
**CONCERN STATEMENT:** Commenters were concerned regarding the public health consequences of herbicide use.

<b>Representative Quote(s):</b>	<b>Corr. ID:</b> 1	<b>Organization:</b> <i>Not Specified</i>
	<b>Comment ID:</b> 338636	<b>Organization Type:</b> Unaffiliated Individual
	<b>Representative Quote:</b> I think the use of herbicides should be kept to the very minimum. We still don't know what causes a lot of medical problems in our children and wildlife would be better off also.	
	<b>Corr. ID:</b> 11	<b>Organization:</b> <i>Not Specified</i>
	<b>Comment ID:</b> 338668	<b>Organization Type:</b> Unaffiliated Individual
	<b>Representative Quote:</b> The use of these chemicals brings too many negative consequences to justify their benefits, poisoning the environment and very likely ultimately contributing to human health problems as well.	
	<b>Corr. ID:</b> 30	<b>Organization:</b> Environmental Protection Information Center
	<b>Comment ID:</b> 340310	<b>Organization Type:</b> Conservation/Preservation
	<b>Representative Quote:</b> The potential for human exposure to toxic chemicals must be assessed and disclosed	

**PN1000 – PURPOSE AND NEED: PLANNING PROCESS AND POLICY**

<b>Concern ID:</b>	49726
<b>CONCERN STATEMENT:</b>	Commenters questioned the level of NEPA analysis needed.
<b>Representative Quote(s):</b>	<b>Corr. ID:</b> 30 <b>Organization:</b> Environmental Protection Information Center <b>Comment ID:</b> 340311 <b>Organization Type:</b> Conservation/Preservation <b>Representative Quote:</b> Significant issues require an Environmental Impact Statement (EIS).  There are multiple significant triggers requiring an EIS: 1.) The action would affect public health and safety, 2.) Unique characteristics of the geographical location, 3.) Using toxic chemical in a national park is highly controversial, 4.) The degree of possible effects on the human environment is uncertain and involves unique risks, 5.) The action may cause loss or destruction of significant scientific, cultural and historic resources and 6.) The action may adversely affect endangered or threatened species and habitat.

**PN3000 – PURPOSE AND NEED: SCOPE OF THE ANALYSIS**

<b>Concern ID:</b>	49719
<b>CONCERN STATEMENT:</b>	Commenters posed questions related to the scope of the analysis.
<b>Representative Quote(s):</b>	<b>Corr. ID:</b> 13 <b>Organization:</b> <i>Not Specified</i>  <b>Comment ID:</b> 338682 <b>Organization Type:</b> Unaffiliated Individual <b>Representative Quote:</b> I believe that it is the duty of the National Park service to get control of invasive plant species before they take over more of



our fragile areas thus impacting the native habitat and its inhabitants.

**Corr. ID:** 15                      **Organization:** House Agricultural Consultants/Coco Ranch  
**Comment ID:** 338692      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** The proposed management plan should examine any benefits or ecosystem services now being provided by the existing species. The plan should avoid the fundamentalist, a priori position that all non-natives species are bad and are to be removed.

**Corr. ID:** 24                      **Organization:** Topanga Watershed Comm.  
**Comment ID:** 342041      **Organization Type:** Civic Groups  
**Representative Quote:** I would be very interested in a public discussion on how an invasive plant is identified for eradication. Who decides and defines the 25 invasive plants in Calif?

**Corr. ID:** 28                      **Organization:** *Not Specified*  
**Comment ID:** 338737      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Considering the two joint parks together is a strange combination. What will work in one area may not work in the other area or may have to be changed radically.

**Corr. ID:** 28                      **Organization:** *Not Specified*  
**Comment ID:** 338741      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** What is really considered a "native" plant and what is considered a "nonnative" plant?

**Corr. ID:** 30                      **Organization:** Environmental Protection Information Center  
**Comment ID:** 340299      **Organization Type:** Conservation/Preservation  
**Representative Quote:** Redwood National Park also manages three other State Parks included within its legislated boundary. Are these parks also included in the proposed action?

#### **RFI000 - REFERENCES: GENERAL COMMENTS**

**Concern ID:** 49716  
**CONCERN STATEMENT:** Commenters suggested additional sources of information or studies to consider when developing the IPMP/EA and alternatives.  
**Representative Quote(s):** **Corr. ID:** 4                      **Organization:** Malibu Ag  
**Comment ID:** 338642      **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Please contact Occidental Arts and Ecology Center in Occidental California. [Oaec.org/wildlands-biodiversity](http://Oaec.org/wildlands-biodiversity).  
 ...Their Wildlands Biodiversity Program provides education about effective restoration theory and methods...You can contact Wildlands Program Associate Director Lindsay Dailey at (707) 874-1557 ext. 127.  
[lindsay@oaec.org](mailto:lindsay@oaec.org)

**Corr. ID:** 10 **Organization:** Malibu Ag  
**Comment ID:** 338658 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** A study below shows the compound POE-15 used in herbicides like round-up are more toxic than the active ingredient and often not listed or tested.  
[http://www.criigen.org/SiteEn/index.php?option=com\\_content&task=blogcategory&id=89&Itemid=132](http://www.criigen.org/SiteEn/index.php?option=com_content&task=blogcategory&id=89&Itemid=132)  
 THE MOST WIDELY USED HERBICIDE IN THE WORLD CONTAINS COMPOUNDS MORE TOXIC THAN DECLARED (1)

**Corr. ID:** 10 **Organization:** Malibu Ag  
**Comment ID:** 338655 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Kat Anderson is the leading scientist in the field of restoration ecology. Please contact her for expert leadership and cutting edge, safe, chemical free techniques.

#### **SE4000 - SOCIOECONOMICS: IMPACT OF PROPOSAL AND ALTERNATIVES**

**Concern ID:** 49725  
**CONCERN STATEMENT:** Commenters expressed concerns regarding the economic effects of the proposal and alternatives.  
**Representative Quote(s):** **Corr. ID:** 30 **Organization:** Environmental Protection Information Center  
**Comment ID:** 340319 **Organization Type:** Conservation/Preservation  
**Representative Quote:** Please include a thorough discussion of economic issues related to the proposal and alternatives. With respect to indirect costs, costs associated with cleaning up toxic spills are relevant and need to be disclosed.

#### **WH4000 – WILDLIFE AND WILDLIFE HABITAT: IMPACT OF PROPOSAL AND ALTERNATIVES**

**Concern ID:** 49718  
**CONCERN STATEMENT:** Commenters expressed concerns that herbicide use is harmful to wildlife and their habitats.  
**Representative Quote(s):** **Corr. ID:** 12 **Organization:** Not Specified  
**Comment ID:** 338671 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Native animals of course can't read signs and will be driven away or killed.  
**Corr. ID:** 17 **Organization:** Not Specified  
**Comment ID:** 338708 **Organization Type:** Unaffiliated Individual  
**Representative Quote:** Herbicide application by air has the potential to cause serious damage to a host of native species, including lichen and other sensitive plants and organisms. An increasing body of new evidence indicates that herbicides that have been routinely used by the park service and deemed safe are causing serious impacts on bee species, including honeybees and native

pollinators.

**Corr. ID:** 30

**Organization:** Environmental Protection  
Information Center

**Comment ID:** 340297

**Organization Type:** Conservation/Preservation

**Representative Quote:** EPIC is very concerned that Redwood National  
Park's Invasive Plant Management Plan proposes the use of herbicides, which  
are toxic to plants, animals and people.

#### **WQ4000 – WATER RESOURCES: IMPACT OF PROPOSAL AND ALTERNATIVES**

**Concern ID:** 49723

**CONCERN  
STATEMENT:**

Commenters expressed concerns that herbicide use is harmful to water quality.

**Representative  
Quote(s):**

**Corr. ID:** 17

**Organization:** *Not Specified*

**Comment ID:** 338709

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Herbicides broadcast by aircraft also have a greater  
chance of negatively impacting water quality throughout the watershed.

**Corr. ID:** 30

**Organization:** Environmental Protection  
Information Center

**Comment ID:** 340304

**Organization Type:** Conservation/Preservation

**Representative Quote:** The environmental documentation must list all water  
bodies that are located within the proposed project area as well as the aquatic and  
riparian dependent species present in those waters and riparian areas. Assessment  
of impacts on aquatic and riparian wildlife and ecosystems should include but not  
be limited to endangered, threatened, candidate and at risk species.