



File Code: 1950
Date: June 6, 2016

Dear Interested Parties:

The Lincoln National Forest is interested in receiving further public input on its management strategy for treating non-native invasive plants (NNIP) across the Forest. We will soon be preparing an Integrated Non-Native Invasive Plant Management environmental impact statement (EIS) to document and publicly disclose the environmental effects of implementing a management strategy for treating NNIP.

A scoping letter initiating the planning for this project was distributed in September 2010. We received a total of 13 comment letters from agencies, organizations, and individuals in response to the original scoping request. The comments received were used to refine and update the proposal and will be considered in this environmental analysis. Changes in NNIP infestations and in law, regulations, and policies were also used to update the proposal. Due to the lapse in time since we issued the first scoping notice, we are offering another opportunity to provide input.

To assure your comments are fully considered during this scoping phase of the project, we request that you submit comments by **July 11, 2016**. Also, please take this opportunity to comment if you would like to be included in future mailings concerning this project. Additional comments are welcome throughout the planning process.

Purpose and Need for Action

Executive Order 13112, Forest Service Manual 2900, and Lincoln National Forest Land and Resource Management Plan (Forest Plan), provide direction related to the management of invasive species. Executive Order 13112 directs Federal agencies to prevent and control invasive species and to minimize their economic, ecological, and human health impacts. The order provides for restoration of native species and habitat conditions in ecosystems that have been invaded by non-native invasive species.

A non-native invasive plant species is defined as any terrestrial or aquatic plant species occurring outside its natural range that is likely to cause economic or environmental harm or harm to human health. If a native plant species is deemed a noxious weed by the New Mexico Department of Agriculture or another agency because it is likely to cause economic or environmental harm or harm to human health, then the species would also be considered for treatment under this analysis and decision. The overall purpose of this project is to implement a management strategy that uses an integrated selection of techniques designed to prevent the introduction of and control the spread of non-native invasive plants (NNIP). A second purpose is to ensure that the strategy is adaptive, allowing for the treatment of new NNIP infestations and use of new treatment options, including new herbicides, because future NNIP management needs may be different. As such, there are underlying needs to:

- Utilize the most effective and economical strategies to treat NNIP while protecting valued resources to the greatest practical extent; and,
- Adapt management techniques to accommodate new NNIP infestations and treatment options, including new herbicides, within the scope of this analysis and resulting decision.



Proposed Action

The proposed action presents a forest-wide integrated weed management (IWM) strategy, as defined in the Forest Service Manual 2900 (December 5, 2011), for the prevention, eradication, suppression, and reduction of existing and future non-native invasive plant infestations. The IWM strategy is based on ecological factors and includes consideration of site conditions, other resource values, resource uses, NNIP characteristics, and potential effectiveness of control measures for specific circumstances.

The IWM strategy includes prevention, early detection and rapid response, control and management (treatment), restoration, and organizational collaboration. The IWM strategy includes different levels of management designed for eradication, containment, control or suppression of NNIP infestations. These levels of management are defined as:

- **Eradication** is an attempt to totally eliminate a NNIP population from a Forest Service unit;
- **Containment** is the prevention of the spread of NNIP species beyond the perimeter of patches or infestation areas mapped from current inventories;
- **Control** is the reduction of infestations over time; and,
- **Suppression** is the prevention of seed production throughout the target patch and reduction of the area coverage.

The proposed action includes a wide range of treatment methods including options to use a combination of methods on the same site. It also was developed to minimize risk of adverse impacts through resource protection measures. These resource protection measures are designed to minimize, avoid or mitigate adverse effects which could occur as a result of implementing proposed NNIP treatments on the Forest. The resource protection measures are based on Forest Plan direction and policy, best available science, and site-specific evaluations.

Treatment Priority Criteria

Since eradicating or controlling every current and new NNIP infestation is not feasible, infestations would be selected for treatment based on the prioritization criteria displayed in Table 1. The criteria considers the expected treatment effectiveness, the aggressiveness of the target species, the location of the infestation, and the potential impacts of the infestation on species and areas of special concern if left untreated. The number of acres treated would depend on the availability of funding and qualified personnel.

Priority would generally be given to new populations of aggressive NNIP species where long-term management can be successful. An example would be a new site consisting of five plants of leafy spurge, where eradication may be possible. On larger, well established infestations where long-term effectiveness is questionable, such as 200 acres of musk thistle, containment, control, and suppression strategies play a much more important role.

Table 1. Non-native invasive plant treatment priority

Priority of Treatment	Infestation Area Description
First (Highest)	<ul style="list-style-type: none"> • Eradication of new species (focus on aggressive species with potential for significant ecological impact including but not limited to New Mexico Department of Agriculture listed high priority species – Class A Species¹). • New infestations (any State, County, and Forest-listed highest priority species – Class B²). • Areas of high traffic, spread vectors and sources of infestation (e.g., parking lots, trails and trailheads, roadsides, horse camps, and gravel pits). • Areas of special concerns, such as: wilderness areas, research natural areas, big game winter ranges, adjacent boundaries/access with National Parks, riparian corridors or threatened, endangered & sensitive plant populations where there is a high threat to species of concern. • Areas where partnership/cooperator agreements are in place.
Second	<ul style="list-style-type: none"> • Containment of existing large infestations (e.g. focus on State, County, and Forest-listed highest priority species – Class C³) – focus on boundaries of infestation. • Roadsides, trails, and trailheads – focus first on access points leading to areas of concern.
Third	<ul style="list-style-type: none"> • Control of existing large infestations (e.g. State-listed and Forest second priority species).
Fourth	<ul style="list-style-type: none"> • Suppression of existing large infestations when eradication, control or containment is not possible. • Species listed as Watch List Species⁴ by the New Mexico Department of Agriculture.

1. **Class A Species:** These invaders are highest priority for control. The discovery of any new populations would prompt immediate eradication actions using the most efficient IWM approach. This would include those species listed as Class A Species by the New Mexico Department of Agriculture.
2. **Class B Species:** Some infestations of Class B species are relatively large, yet they are still geographically limited to only a portion of the Forest. If eradication is not possible, then containment and control is the goal. Class B includes those species listed as Class B Species by the New Mexico Department of Agriculture.
3. **Class C Species:** Most of these species exist in extensive, widespread infestations, a great deal of resources would be required to reduce or eradicate populations. The key management approach with these NNIP species is to control and contain existing populations and to eradicate new populations in previously un-infested areas.
4. **Watch List Species:** Species of concern in the New Mexico Department of Agriculture. Watch list species have the potential to become problematic.

Treatment Options

Selection of the most appropriate treatment practice, or combination of treatments, depends on numerous factors, including the size of the infestation, risk of NNIP expansion, species biology, environmental setting, potential impacts to other resources, and management objectives. Treatment practices available for use would include manual, mechanical, biological, and chemical treatments. Each of these treatments are described below. Figure 1 is a decision key to determine the appropriate treatment option or combination of options to be used.

Where the objective for a given population is eradication and the target NNIP species has developed a large seedbed, follow-up treatments are often necessary, either as a second herbicide application or another method. In many NNIP populations with seedbeds established, the follow up treatments are needed to eliminate new sprouts that were in seed during the initial treatment.

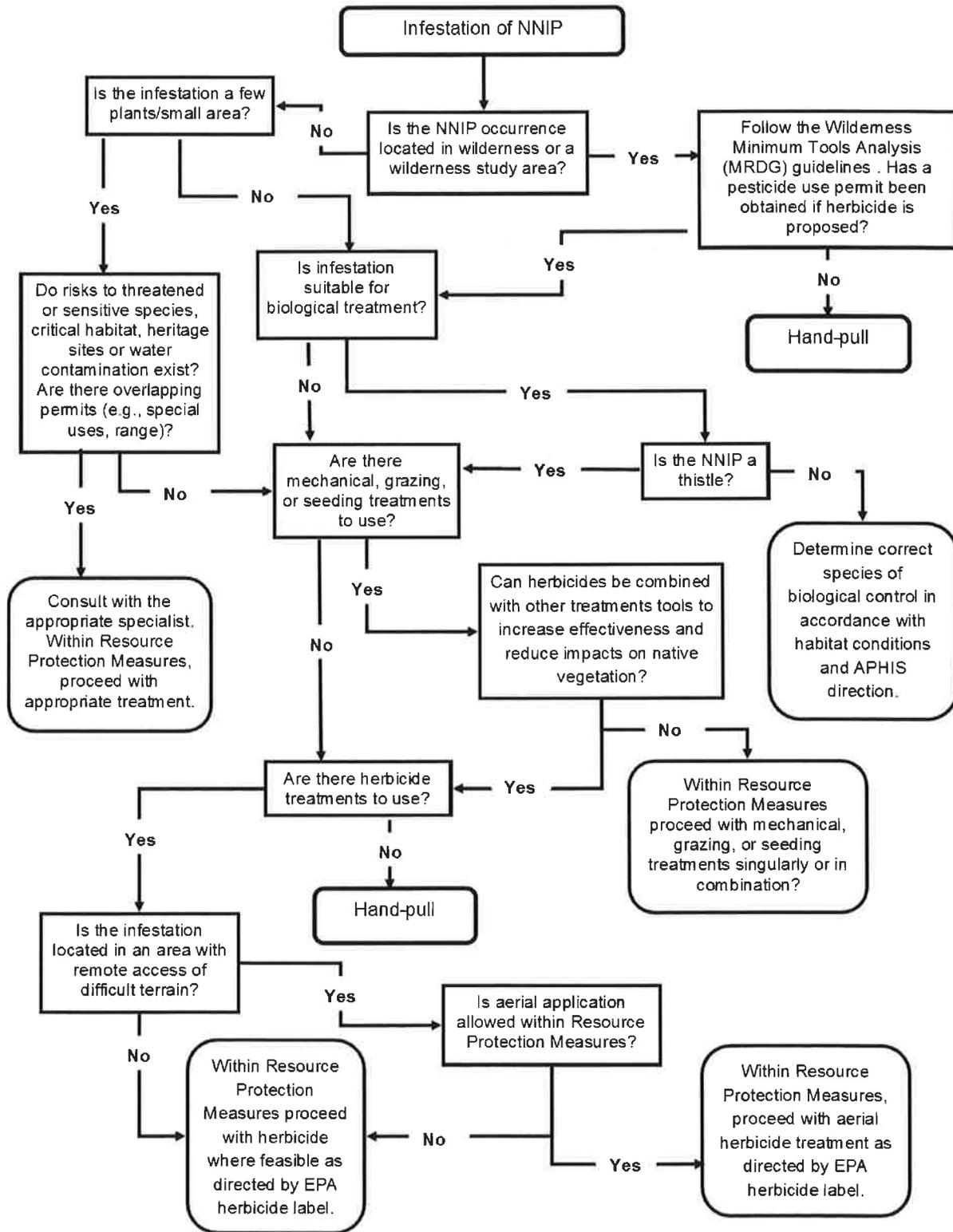


Figure 1. NNIP treatment decision key

Manual and Mechanical Control

Manual control methods involve hand-pulling or digging with hand tools like shovels or hoes, or hand-operated power tools. It may also involve clipping or cutting off the tops of the NNIP by hand. This method would be most often applied to small populations (less than an acre) and the populations that are located in areas of concern, such as riparian areas where native and non-native thistles are co-located.

Mechanical control methods include actions such as girdling, grubbing, masticating, plucking, mowing and root tilling. Mowing, girdling and masticating cuts NNIP off above ground while plucking, root tilling and grubbing digs into the soil to unearth the roots. These methods employ large mechanized equipment, such as tractors with specially designed attachments. Most mechanical treatment is proposed in combination with another method.

Biological Treatments

Biological Control

Biological control involves using living organisms such as insects, nematodes, bacteria or fungi that target and weaken specific NNIP species. Biological control agents must be subjected to rigorous screening by the USDA Animal and Plant Health Inspection Service (APHIS). Only those agents that have been approved and certified by APHIS, and deemed to be virtually harmless to native or desirable non-native plants, would be used. The use of these biological controls would be coordinated with the New Mexico Department of Agriculture. Because a biological control agent often depends on the target plant for survival, the feasibility of this control method is limited to larger infestations (the infestation must be large enough to support the agent). In general, biological control agents are used in combination with other treatment methods.

Controlled Grazing

Controlled grazing, also known as targeted grazing, is the practice of using grazing animals (generally cattle, sheep or goats) as a tool to control NNIP. It is generally more effective on large infestations where the application can be repeated or used in conjunction with other treatment methods. The availability of herds managed for this type of control may be limiting. This method is primarily proposed as a minor, incidental treatment method. Where appropriate, grazing would be integrated with other treatment methods to achieve more effective NNIP control.

This NNIP control method would be conducted in accordance with Forest Service grazing regulations and regional policy. A site-specific project operation plan would be developed for the treatment area that would consider factors such as target NNIP species, type of livestock to be used, forage preference, planned grazing intensity, herding characteristics, topography, water availability, and season of use, existing grazing operations, and a monitoring program.

Chemical Treatments

Chemicals used to control plants are known as herbicides. Similar Forest Service efforts, including those on the Forest, have shown that herbicides are the most effective and economical treatment method for eradicating or controlling the NNIP species that currently exist on the Forest. This is especially true when chemicals are used as one component of an integrated treatment effort. Herbicides are best suited for NNIP infestations where non-herbicide methods are not feasible or appropriate, due to ineffectiveness of other treatments, species characteristics, population size, treatment priority and objective, or access or terrain limitations of other methods.

Only herbicide formulations (products) that have been registered with the EPA for rangeland, forest land, or aquatic use would be applied. The herbicide label is a legally binding document that provides specific direction on how and where to use an herbicide. All herbicides would be used only as directed on the herbicide label. For example, only herbicides approved for aquatic use may be applied adjacent to water sources, as specified on the label and discussed in the resource protection measures.

The Forest Service has completed human health and ecological risk assessments (<http://www.fs.fed.us/foresthealth/pesticide/risk.shtml>) that evaluate the risk of specific herbicides to humans and other species in the environment. Only those herbicides that have a risk assessment completed would be used; risk assessment can be completed by the Forest Service or other federal agencies. The primary herbicides proposed for use on the Forest include, but are not limited to: aminocyclopyrachlor, aminopyralid, 2, 4-D, chorsulfuron, clethodim, clopyralid, dicamba, endothall, fluazifop-p-butyl, fluridone, fluroxypyr, glyphosate, hexazinone, imazamox, imazapic, imazapyr, metsulfuron methyl, oxyfluorfen, picloram, sethoxydim, sulfometuron methyl, triclopyr, and trifluralin.

Herbicide application methods include hand/selective and broadcast applications (including aerial application). Hand/selective treatments include treatments of individual plants to avoid contact with other desirable plants. There is a low likelihood of drift or delivery of herbicides away from treatment sites. This method is used in sensitive areas, such as near water or where plants of conservation concern could be affected, to avoid getting any herbicide on the soil or in the water. Hand/Selective methods could be done under more variable conditions than broadcast applications. Broadcast applications include other forms of herbicide treatments. Table 2 provides a description of these methods.

Table 2: Herbicide application methods

Method	Description
Hand/Selective	<p><u>Daubing or Wicking and Wiping</u>: Involves using a sponge or wick on a long handle to wipe herbicide onto foliage and stems. Use of a wick eliminates the possibility of spray drift or droplets falling on non-target plants. Herbicide can drip or dribble from some wicks.</p> <p><u>Foliar Application</u>: These methods apply herbicide directly to the leaves and stems of a plant. An adjuvant or surfactant is often needed to enable the herbicide to penetrate the plant cuticle, a thick, waxy layer present on leaves and stems of most plants. There are several types of foliar application tools available.</p> <p><u>Basal Bark</u>: This method applies a 6 to 12 inch band of herbicide around the circumference of the trunk of the target plant, approximately one foot above ground. The width of the sprayed band depends on the size of the plant and the species' susceptibility to the herbicide. The herbicide can be applied with a backpack sprayer, hand-held bottle, or wick.</p> <p><u>Frill or Hack and Squirt</u>: The frill method, also called the "hack and squirt" treatment, is often used to treat woody species with large, thick trunks. The tree is cut using a sharp knife, saw, or ax, or drilled with a power drill or other device. Herbicide is then immediately applied to the cut with a backpack sprayer, squirt bottle, syringe, or similar equipment.</p> <p><u>Stem Injection</u>: Herbicides can be injected into herbaceous stems using a needle and syringe. Herbicide pellets can also be injected into the trunk of a tree using a specialized tool.</p>

Method	Description
Hand/Selective	<p>Cut-stump: This method is often used on woody species that normally re-sprout after being cut. Cut down the tree or shrub, and immediately spray or squirt herbicide on the exposed cambium (living inner bark) of the stump. The herbicide must be applied to the entire inner bark (cambium) within minutes after the trunk is cut. The outer bark and heartwood do not need to be treated since these tissues are not alive, although they support and protect the tree's living tissues. The cut stump treatment allows for a great deal of control over the site of herbicide application, and therefore, has a low probability of affecting non-target species or contaminating the environment. It also requires only a small amount of herbicide to be effective.</p>
Broadcast	<p>Ground-based spraying: The most common broadcast method used on Forest Service lands involve a ground-based spray vehicle (truck, tractor or all-terrain vehicle) and a handheld sprayer with a single nozzle. The herbicide is carried in a tank on the vehicle and reaches the nozzle via tubing. All herbicides are metered out from the nozzles in a controlled manner. The nozzle controls the droplet size, the area (or cone) being covered by the herbicide and it could be turned on/off with ease. Some nozzles can rotate. All this flexibility permits the operator to carefully apply herbicide at specific rates over specific areas. Backpacks, and pack animals may also be used as a broadcast tool, if not directed at individual plants.</p>
	<p>Boom spraying: A less common method includes a boom, a long horizontal tube with multiple spray heads, which may be mounted or attached to a tractor, all-terrain vehicle or other vehicle. The boom is then carried above the invasive plants while spraying herbicide, allowing large areas to be treated rapidly with each sweep of the boom. Many of the new boom spray operations have very sophisticated electronic monitoring that delivers exact amounts of herbicides and keeps records on rates and areas covered. Boom spraying is not used often on National Forest System lands; it can be used in right-of-ways, utility corridors, and roadside prisms.</p>
	<p>Aerial application: This treatment method is generally a broadcast method. Aerial application can be an effective means of controlling or eradicating large NNIP infestations, or infestations in areas that have steep slopes, rocky soils, and are either difficult to reach or lack access to effectively treat from the ground. Aerial application provides a means to effectively treat infestations in isolated areas rapidly and efficiently, dramatically reducing the threat of further establishment or expansion. Aerial herbicide application by helicopter could potentially occur in selected locations of the Forest including designated wilderness areas. Herbicides that would be considered for application include those chemicals proposed in ground-based herbicide applications. The herbicide(s) selected for a particular aerial treatment depend on the same factors included in the Decision Tree (see Figure 1). Aerial application would only occur when wind speed is less than 6 miles per hour and blowing away from sensitive resources.</p>

The application of herbicides may involve cross-country travel with off-highway vehicles. Any cross-country travel must be consistent with either the current motor vehicle use map (MVUM) or a contract/permit issued for the treatment of the NNIP.

Adaptive Management Strategy

The following adaptive management strategy would be used to determine treatment of identified and future NNIP infestations. The adaptive management strategy includes:

- The decision (if and how) to treat newly discovered NNIP infestations would be driven by the decision tree (Figure 1) and the treatment criteria section (see Table 1);

- New infestations may be treated with variable treatment options as long as areas treated remain within limits described in the decision tree (see Figure 1) and adhere to all resource protection measures; and,
- The decision (if and how) to use new technologies and treatment methods, including new biological controls or herbicides, to improve effectiveness and reduce impacts

This adaptive management strategy consists of two principle components: the ability to effectively treat new infestations as they are detected; and, the ability to incorporate new technology as it becomes available. Each principle is described below.

Principle 1 – Treating New Infestations and Invaders

To quickly and effectively treat newly discovered NNIP infestations, a Decision Tree (see Figure 1) based on site characteristics, NNIP species, and location would be used to select treatment methods. Using an adaptive management strategy allows for treatment of new sites or new species without a delay, while still addressing other resource concerns. Although treatments of NNIP are expected to be effective in reducing existing infestations, all infestations cannot be treated immediately due to budgetary and logistical limitations. Existing NNIP infestations will expand before they can be treated, and new areas will be identified. Since every acre of the Forest has not been inventoried for NNIP infestations, many existing sites have yet to be identified. Also, new NNIP species may occur and be incorporated into this analysis.

Principle 2 – Incorporating New Technology and Treatment Methods

To improve effectiveness and reduce impacts, new technologies, biological controls, or herbicides would be evaluated for use. New technology, biological controls, herbicide formulations, and supplemental labels are likely to be developed in the future. These new treatments would be considered when there are indications that they would be more NNIP-specific than methods analyzed here, less toxic to non-target vegetation, or less persistent and less mobile in the soil. New herbicides may be used when they become available if they are permitted by the US Environmental Protection Agency (EPA), have a human health and environmental risk assessment completed per direction of Forest Service Handbook (FSH) 2109.14, Chapter 10, and are registered for use by the New Mexico Department of Agriculture. The adaptive management strategy would allow incorporation of these new products and treatment methods.

- New herbicides or formulations registered and approved by the EPA would be applied according to label specifications.
- Application methods and resource protection measures would be used.
- The decision by the line officer to use a new treatment method would be driven by an interdisciplinary review (FSH 1909.15, Chapter 10, Section 18.4) to confirm that the new treatment is within the scope of this analysis.
- A risk assessment must be completed per FSH 2109.14, Chapter 10 for the herbicide. These assessments could be completed by the Forest Service, the Natural Resources Conservation Service, USDA Agriculture Research Station, EPA, or other authorized agency.
- New biological control agents that are approved and certified by the APHIS and the New Mexico Department of Agriculture prior to their introduction. Biological control agents should be harmless to native or desirable non-native plants.

- Cost effective mechanical methods of treatments are developed. These methods would be reviewed before use to determine if other resource protection measures can be maintained.

Forest Plan Amendment

The project would require an amendment to the Lincoln's Land and Resource Management Plan (Forest Plan). The project proposes use of herbicides in places and under conditions that were not foreseen when the existing Forest Plan standards and guidelines were developed in 1986. To meet the purpose and need for this project, it may be necessary to treat areas infested by nonnative, invasive plants using methods that would be more effective than previously-authorized methods or under circumstances that were not previously considered.

The proposed amendment would modify Forest Plan standards and guidelines so new controls and technologies can be utilized where appropriate. The proposed amendment would also encourage close collaboration with affected individuals or entities prior to project implementation. . The proposed amendment would continue to maintain adequate protection of municipal water supplies, soil productivity and stability, water quality, species of conservation concern, and human health and safety.

The Forest Plan also prohibits herbicide use if an environmental analysis shows that it is not "economical, biologically sound and environmentally acceptable". This broad standard reiterates existing law (NEPA), regulation, and policy (Executive Order 13112-Invasive Plants) related to herbicide application but does not prescribe direction at the plan level. The proposed amendment would address this issue by identifying more specific direction at the plan level.

The U.S. Fish and Wildlife Service has made changes to the list of species protected under the Endangered Species Act since the Forest Plan was signed in 1986. The proposed amendment incorporates new or modified U.S. Fish and Wildlife direction to protect Federally-listed or candidate species that may be impacted by the project.

This amendment may change forestwide standards and guidelines applicable to all areas for wildlife (pages 31-34), grazing management (page 35 and replacement page 35B), soil and water (pages 40-41), fire and protection (replacement page 55), all species (pages 205-206), Mexican spotted owl (replacement page 206A), peregrine falcon (page 207), and northern goshawk (replacement page 208A and 208E). The amendment also would change standards and guidelines related to protection in management area 1C Capitan Mountains Wilderness (replacement page 62), management area 1F White Mountain Wilderness (replacement page 70), management area 1H RNA William G. Telfer Research Natural Area (page 77), and management area 3A RNA Upper McKittrick RNA (page 115). If adopted, this would be the eighteenth amendment to the Forest Plan since its inception in 1986.

How to Submit Comments

On March 27, 2013, a final rule revising 36 CFR Part 218 was published in the Federal Register and became effective on that date. This rule provides the public an opportunity to comment and express concerns on projects before decisions are made, rather than after. The Forest Service believes this aligns with our collaborative approach to forest management and increases the likelihood of resolving those concerns, resulting in better, more informed decisions. Your comments will be most valuable if they are specific to this project area and the proposed activities or the proposed amendment. This project is subject to objection procedures and public notification requirements set forth by 36 CFR 218. The proposed amendment was first initiated and scoped with the public in September 2010. Therefore, pursuant to transition provisions in the 2012 Planning rule (36 CFR 219.17(b)), the responsible official may choose to apply either the 1982 Planning Rule or 2012 Planning Rule to the amendment process.

The Forest is now seeking input from individuals, organizations, local and state governments, and other federal agencies that may be interested in or affect by the proposed action in regard to the scope and nature of issues to be addressed in this EIS. Reviewers should clearly articulate their concerns and contentions related to the project proposal. Comments should be within the scope of the proposed action, have a direct relationship to the proposed action, and must include supporting reasons for the responsible official to consider (36 CFR 218.2). More specifically, scoping comments may pertain to the nature and scope of the environmental and social issues associated with the proposed action, and may suggest measure that could be taken to minimize adverse environmental effects, including any proposed reasonable alternatives.

Comments will help the Forest Service prepare a draft EIS. This solicitation serves as a designated opportunity for public comment. Individuals and entities who have submitted specific written comments during scoping will be eligible to file an objection as defined in 36 CFR 218.

The Forest is now providing a 30-day scoping period, commencing the day after the notice of intent is published in the Federal Register, approximately on June 10, 2016. Written scoping comments to be considered in preparation of the EIS should be submitted by July 11, 2016. The publication date of the Federal Register notice is the exclusive means for calculating the designated comment period.

The responsible official for this project and the decision is Lincoln National Forest, Forest Supervisor for the Lincoln National Forest. Written comments regarding the Project can be sent electronically via email, mailed via the post office, or faxed to one of the following. Comments may also be delivered by hand between the hours of 8:00 am to 4:30 pm Monday through Friday, excluding federal holidays.

Mail: Aurora Roemmich, Non-Native Invasive Plant Project, Lincoln National Forest, 3462 La Palomas Road, Alamogordo, NM 88310.

Fax: (575) 434-7218

Email: <http://www.fs.usda.gov/project/?project=31150>. On the right-hand side "Get Connected", click "Comment on Project" to submit comments on this project.

Electronic comments may be submitted in a format such as an e-mail message, plain text (.txt), rich text format (.rtf), or Word (.doc). Those submitting electronic comments should put the project name in the subject line. In cases where no identifiable name is attached to a comment, a verification of identity will be required for objection eligibility, if an emergency situation determination is not approved. It is the responsibility of persons providing comments to submit them by the close of the comment period and to ensure that their comments have been received when they are submitted electronically. Individuals and organizations wishing to be eligible to object must meet the information requirements of 36 CFR 218. This includes name, postal address, title of the project, and signature or other verification of identity upon request and identity of the individual or entity who authored the comments.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record for this project, available for public inspection, and released if requested under the Freedom of Information Act. Comments submitted anonymously will be considered; however, anonymous comments will not provide the Agency with the ability to provide the respondent with subsequent environmental documents.

If you have any questions or would like additional information contact Aurora Roemmich (575- 434-7266 or aurorarroemmich@fs.fed.us) or Jennie O'Connor Card (406-522-2537 or jennieoconnorcard@fs.fed.us).

Sincerely,



BARRY L. IMLER

Acting Forest Supervisor

cc: Jennie O'Connor Card, Peggy Luensmann, Aurora Roemmich, Sabrina Flores

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