

## Comments on BLM DEIS - 2/2/06, Eugene Skrine

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1) As best I can figure, the underlying Need for Action is identified as: "1) controlling weeds and invasive species; 2) manipulating vegetation to benefit fish and wildlife habitat, improve riparian and wetland areas, and improve water quality in priority watersheds (Ex Summary 1)." The use of herbicides is not the only way to meet this need.

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Preventing the introduction, establishment and spread of invasive plants in the first place is the best approach to meeting the underlying need for action. Why isn't invasive plant prevention addressed and emphasized in this EIS?

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2) The last EIS the BLM used to assess, compare and disclose the effects of its vegetation treatment program, including - herbicides, manual, mechanical, biological control, and the use of fire was developed in the late 1980s and early 1990s. A lot has been learned about the underlying causes and behaviors of invasive plants since that time. The BLM's 1980s analysis is likely out of date, and in need of revision (Malheur case). Without this type of updated analysis, how can the true effects of the treatments be disclosed? Without this type of more inclusive analysis, how can even the tradeoffs between the use of different herbicides be accurately disclosed, i.e., "how does the public know how critical a certain chemical is to meeting the need for action? Is this chemical the only way, or can the problem also be controlled, possibly better, thru a combination of methods, including, prevention, and nonchemical treatment methods?"

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3) The Range of Alternatives considered in the DEIS are too narrow. The only Alternative that considers use of non-chemical methods is Alternative C, No Use of Herbicides. This creates a false choice. In the real world, the treatment of invasive plants is not an all herbicides or no herbicides proposition. The best choice for treatment is most often a combination of these methods. These combination alternatives need to be considered. Invasive plant prevention and site restoration also need to be included. Only focusing on treatment, and excluding other important elements of Integrated Weed Management, almost assure the continuation of the invasive plant problem. Only a thoughtful combination of prevention, treatment (both herbicides and

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non-herbicides) and site restoration will assure success in meeting the stated underlying need.

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4) CEQ requires consideration of mitigation measures, i.e., has the agency considered everything reasonably to mitigate the unavoidable impacts of their action. Invasive plant prevention, the use of some non-herbicide treatment methods, and site restoration can reduce the environmental impacts of the BLM's herbicide proposal. These practices and methods need to be addressed in this EIS.

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