



February 10, 2006

Brian Amme, Project Manager  
National Vegetation EIS  
BLM Nevada State Office  
1340 Financial Boulevard  
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**RE: Draft Programmatic Environmental Impact Statement and Environmental Report for Vegetation Treatments on Public Lands Administered by the Bureau of Land Management in the Western United States, Including Alaska. 70 FR 68474. November 10, 2005.**

Dear Mr. Amme:

1 CropLife America (CLA) is pleased to comment on this draft "Programmatic Environmental Impact Statement" (PEIS). CLA is the national trade association representing the plant science industry. CLA supports a network of regional and national associations led by multinational companies. We are committed to the safe and responsible use of the industry's products in order to provide safe and abundant food, fiber and other benefits to the public, including vegetation management.

see FL0004 CLA urges the Bureau of Land Management (BLM) to adopt the Preferred Alternative B, "Expand Herbicide Use and Allow for Use of New Herbicides," for treating and managing vegetation on BLM-managed public lands. The stated purpose of the PEIS is to reduce risk of catastrophic wildfire and to improve the health of the nation's forests and rangelands. Proper use of the most effective herbicides for specific vegetation treatment will result in overall decreased use of herbicides. Herbicides are rarely needed in a healthy wildlife environment where stress on an intact plant community is limited or infrequent. However, the introduction of noxious weeds, too frequent fire, over grazing, and drought can fragment desirable plant communities in areas dominated by noxious weeds. To rehabilitate and increase the area of plant communities that are resilient to noxious weeds, herbicides must be an option for any integrated vegetation treatment program. A national policy that disapproves herbicide use or restricts use of ALS inhibitor herbicides or prohibits all aerial application will severely hamper rehabilitation and improvement of land infested by invasive weeds. Consequently, limiting or stopping use of herbicides on BLM-managed public lands will result in greater economic and ecological hardship for neighboring federal, state, and private properties, as wildfires, noxious weeds, and erosion problems do not respect property boundaries.

**Alternative A** – the "No Action Alternative," – does not provide the tools necessary for hazardous fuel reduction, emergency stabilization and rangeland rehabilitation programs. The

BLM land base will continue to degrade at an accelerated rate if vegetation treatment continues under alternative A. CLA does not support Alternative A.

**Alternative B** – “Expand Herbicide Use and Allow for Use of New Herbicides” – is the most effective alternative for improving the health of the nation’s forests and rangelands. Although Alternative B allows for a greater number of acres to be treated, the eventual result should be a decrease in the overall amount of herbicides needed. Newer herbicides, which are effective at lower use rates, will (1) help to reduce the overall amount of herbicides applied to control weeds; (2) build more resilient plant communities, reducing the need for annual herbicide treatments; and (3) allow for improved rapid response to weed problems.

Judicious herbicide use will result in more resilient plant communities and will help reduce the size of catastrophic fires by aiding in creating and maintaining sustainable fuel breaks. The overall result will be healthier forests and rangelands with less use of herbicides on the same acres. CLA strongly urges the adoption of Alternative B.

**Alternative C** – “No Use of Herbicides” – would eventually abandon much BLM land to noxious weeds, until such areas become biological deserts, no longer able to provide healthy habitat for native wildlife. Recreation uses will suffer, and the land will no longer be available for livestock grazing. This alternative shifts the burden of ecological sustainability to adjacent land areas including our National Forests and Parks, Tribal lands, State property, and private property. It also allows BLM lands to become a source of invasive weeds for adjacent lands. CLA does not support Alternative C.

**Alternative D** – “No Aerial Application” – would be devastating to the effectiveness of herbicide use. With today’s Drift Reduction Technology (DRT) including drift reducing booms, droplet regulated nozzles, GIS capability, and anti-drift formulations, aerial application of herbicides is more targeted, more efficient, and has less drift potential than ever before. Aerial application can be more effective and less costly than ground applications. Drift can be minimized by use of selective herbicides and modern, proven application technology; prohibition of aerial application is unwarranted. EPA has recently initiated a program to verify DRTs through a joint effort between the Offices of Pesticide Programs and the Office of Research and Development. The BLM should consider current DRT for both aerial and ground applications and incorporate additional technology verified by EPA’s program, as it becomes available.

Not all BLM land requiring vegetation management treatment has terrain conducive to ground application of herbicides. Use of hand-carried or ground application equipment to treat rough terrain can allow herbicide overlap and skips, causing damage to desired vegetation and leaving noxious weeds to re-populate the area. Some critical habitat areas are only accessible for vegetation treatment by air. The PEIS correctly outlines how aerial application is more cost effective than ground application.

**Alternative E** – “No Use of Sulfonylurea and other Acetolactate Synthase-inhibiting Active Ingredients.” This section puts the greatest restrictions on the BLM for vegetation management restorative processes. The actions called for in this alternative will delay treatment due to lack of time, materials, personnel, and funding.

Alternative E conflicts with one of the key goals of the PEIS: *Use newer, less toxic herbicides where feasible*. Herbicides with the ALS-inhibiting mode of action class are some of the least toxic to wildlife. Herbicides in this category control noxious weeds that no other herbicide in the PEIS will control. Prohibiting the use of all ALS inhibitors will result in extremely limited or no options for control of some weeds on BLM grounds. CLA strongly opposes Alternative E.

#### **Appendix D Protocol for Identifying Evaluating, and Using New Herbicides**

Overall CLA supports the protocol described in Appendix D. An additional valid reason for considering approval of a new active ingredient is to expand availability of alternative products to avoid development of weed resistance. This could be listed among the factors for "Determining the Need for New Herbicides" on page D-2.

#### **Early Detection/Rapid Response**

The PEIS must address Early Detection/Rapid Response (EDRR). Approving the use of a new herbicide, as described in Appendix D, takes 2+ years. This is unacceptable for EDRR. There **MUST** be an approval procedure for EDRR in regard to herbicide use.

When new noxious weed infestations are detected early enough, prompt and coordinated containment and eradication response can reduce environmental and economic impacts. This approach results in lower cost and much less environmental damage than implementing a long-term control program after the species is established.

The PEIS must also address development of sustainable fuel breaks in brush/grasslands in order to limit wildfires to manageable size, as well as protect property, critical habitat areas, and newly revegetated or rehabilitated sites. Fire suppression should be a last resort. Prevention by means of fuel breaks and pro-active fuel management through vegetation treatments should be top priority.

Please do not hesitate to contact Rich Garber of our staff at [rgarber@croplifeamerica.org](mailto:rgarber@croplifeamerica.org) or 208-343-5197 if we can provide any clarifications or answer any questions about these comments.

Sincerely,



Mr. Rich Nolan  
Vice President, Government Affairs