

**Klamath RiverKeeper Program  
Klamath Forest Alliance  
&  
Salmon Forever  
HCR 4 - Box 610  
Forks of Salmon, CA 96031**

To: Mr. Brian Ammee - Project Manager  
National Vegetation EIS  
BLM Nevada State Office,  
P.O. Box 12000  
Reno , NV 895206

EMC0306

January 8, 2006

Dear Brian Mr. Amme,

- 1** The Klamath RiverKeeper Program/Klamath Forest Alliance (KFA) and Salmon Forever would like to thank you for providing us with this opportunity to submit additional comments to you for your documents the Programmatic Environmental Impact Statement (PEIS) for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western and the Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report (PER). These additional comments are submitted to you for the KFA and Salmon Forever.
- 2** The KFA and Salmon Forever incorporates by reference all comments for this BLM project provided by the Natural Resource Defense Council, the Center for Biological Diversity, the Northwest Coalition for Alternatives to Pesticides, Californians for Alternatives to Toxic Spray, and the Pesticide Action Network.
- 3** The United States Bureau of Land Management (BLM) is proposing to spray almost a million acres per year with herbicides to kill invasive plants and control excessive fuels. This triples the agency's current herbicide use on BLM lands in the United States. This proposed BLM action is not an effective way to deal with the agency's invasive plant and fuels management problem. This is partly due to the BLM's refusal to adequately consider and address the causes of invasive plant problems and to develop fuels management programs that result in the reintroduction of natural fire into ecosystems that evolved with fire as a key influence. Instead, the agency is depending inappropriately on the use of herbicides to address the invasive plant problems and reduce excessive fuels on BLM lands. The BLM's over-dependence on the use of herbicides will not adequately result in the stated purpose and need which is to: 1) Reduce Risk from Wildfires and Unwanted Vegetation, and to 3) Protect Life and Property. In fact the proposed action will more likely result in a worse resource condition than currently exists.

4

Activities allowed by the BLM, such as: livestock grazing; road construction, use and management; use of off-road vehicles; timber harvests; mining; energy development; fuels reduction projects; watershed/habitat restoration and various forms of recreation all encourage invasive plants to be introduced, occupy, spread, and cause harm to the natural and human resources on the BLM lands. Several of the Klamath Forest Alliance personnel have witnessed BLM land management activities that have encouraged the introduction and spread of invasive plants on BLM lands while recreating or visiting BLM lands. The BLM needs to change the way the agency manages these activities in order to adequately prevent invasive plant problems.

5

In order for the BLM to implement the proposed action it would require a consistent annual budget at the level required to implement its' proposed program. Government budget are subject to fluctuations and shortfalls. The effective management of invasive plants can only occur if there is consistent and thorough management annually. Without persistent and thorough annual management the program can not be successful.

6

The use of herbicides will eliminate various other non-target plants on the application sites. Reducing desired native plant population and concentrations will create a condition that increases the potential and likelihood for invasive plants. Furthermore, the ineffective control of invasive plants by using herbicides will result in the development of herbicide resistant invasive plants.

7

Negative impacts from toxic spray plan will include direct, indirect and cumulative effects to the environment and human health. Water quality and soil productivity will be reduced to unsafe levels. Non-targeted vegetation, and wildlife (terrestrial and aquatic) will all suffer greatly from the proposed toxic dousing. Native peoples would be specifically exposed to risk during cultural plant gathering practices. Workers applying these hazardous chemicals would be particularly at risk. Recreationalists and other members of the public could also be subject to exposure. The BLM inappropriately states that the risks are worth the benefits .

8

As directed by the BLM's policies, Department of Interior's policies, presidential Executive Order 11312, the BLM should focus primarily on preventing the introduction and spread of prioritized invasive plants rather than relying largely on unproven methods to eliminate existing invasive plant populations through the use of unsafe herbicides on public lands. It is well understood and accepted that the only way to achieve the effective control of invasive plants, the BLM must first adopt strong prevention-based practices for activities (livestock grazing; road construction, use and management; use of off-road vehicles; timber harvests; mining; energy development; fuel reduction projects; watershed/habitat restoration and various forms of recreation) that encourage invasive plants.

9

The PEIS is more focused on insuring the broad-scale application and chronic use of various herbicides than it is on achieving an effective approach to managing invasive plant species. The BLM's proposed action will most certainly fail if the agency does not adequately incorporate proven non-toxic methods to reduce existing invasive plant

9 con't

populations. The BLM needs to make a specific measurable commitment to reducing its reliance on herbicides for controlling target invasive plant species.

10

The use of Tordon/Picloram and other herbicides proposed for use in this project are not authorized for use for controlling invasive plants in California.

11

Segmenting the proposed action in the PEIS and PER, is not consistent with the National Environmental Policy Act, and does not allow for adequate assessment of the human and environmental impacts. This segmentation does not adequately offer the reviewer the information to reasonably assess the effectiveness potential for controlling invasive plants.

12

The PEIS indicates that the past EIS's assessed the modification and control of vegetation on 1/2 million acres. This PEIS identifies there being about 900,000 acres of BLM lands to be managed with herbicides. The BLM states that the PEIS focus is to assess the impacts to the human environment from the proposed herbicide use and that the PEIS will result in a preferred alternative and decision for a federal action on public lands. With 15% of the unwanted vegetation on BLM lands being managed with the use of herbicides, this leaves 85 % of the BLM lands or another 5 million acres of unwanted vegetation to be treated with non-herbicide methods. The BLM indicates that the PER will assess the impacts to the human environment on the remaining 85% of the BLM lands that are occupied with unwanted vegetation. The BLM further states that there will be no new decision for non-herbicide treatments on this remaining 5 million acres. There are several million new acres of unwanted vegetation proposed to be managed in the PER/PEIS for which no new decision will be made. This is not compliant with the requirements under the NEPA, NFMA, ESA, CWA and other pertinent laws and regulations.

13

The Salmon River Restoration Council (SRRC) has created a viable and effective program to control prioritized invasive plant species without relying on the use of herbicides. Refer to [www.srrc.org](http://www.srrc.org) for more details. The SRRC has been successful at controlling over 99% of the spotted and diffuse knapweed plants, California rated Class A-species, in the 1/2 million acre Salmon River area. Approximately 400,000 plants have been successfully eliminated from over 250 populations without the use of herbicides. This area is over 98% in federal lands. The SRRC clearly articulates the type of interdisciplinary approach that relies on multiple key stakeholders to achieve the best success. These stakeholders essential to this successful program includes the private landowners and residents; county, state and federal managing and regulatory agencies; the various resource users; academia, and various types of restoration workers.

14

The proposed BLM approach can not effectively control invasive plants on the BLM's portion of the estimated 35 million acres of public lands where invasive vegetation and noxious weeds are the dominant vegetation. The BLM can not possibly succeed in effectively controlling invasive species unless it attains a high level of cooperation and support from the public, resource users, and all of the other private and public land

14 managers on lands adjacent to BLM lands. We have listed, below, various requirements that BLM must include to achieve effectiveness.

15 To achieve effectiveness, all BLM Programs/Projects must clearly identify the Goals and objectives, including the desired future condition. The desired future condition needs to identify what plant community (native or not) is needed at each site. A plant community that best meets the goals and objectives needs to be part of the desired condition. Identification of the type of ecosystem being managed will help provide varying direction. Ecosystem ex: Agricultural, Urban/Suburban, and Wildland. All laws, regulations, and policies need to be followed.

16 To achieve effectiveness, all BLM Programs/Projects must develop a comprehensive strategy, that identifies all of the integrated elements, including a cost benefits analysis and the level of success that is expected. ( See SRRC 13 Steps Program at [www.srrc.org](http://www.srrc.org) or in its' brochures and handouts). Proven methods need to be utilized, where appropriate. Strategies need to include various assessments and recommendations including: identifying what values needs to be protected and restored; what are the risks associated with the noxious weeds; opportunities and constraints; short and long term cost of management, and timeline of actions to be taken. Action Plans must include tasks such as: preventing the spread at all levels; stakeholder education; coordination/communication; completing a comprehensive inventory of all prioritized species; developing annual work plans for each species; tracking and effectiveness monitoring; and an inclusive program that covers all of the vectors and emphasizes early detection, rapid, response, thorough and persistent treatment, zero seed prescription, and uses the most appropriate tool. Each population needs to be visited at least 3 times a year and have at least 2 sets of eyes per visit. Many species need to be managed year round. All life stages need to be easily identified.

17 To achieve effectiveness, all BLM Programs/Projects must include a strategy that includes the management and evaluation of all of the invasive plant species present at the 5<sup>th</sup> or 4<sup>th</sup> Field Watershed scale, which may include more than one planning unit and managing agencies jurisdiction.

18 To achieve effectiveness, all BLM Programs/Projects can not just manage a single species of prioritized invasive species. A full community of invasive species needs to be managed simultaneously.

19 To achieve effectiveness, all BLM Programs/Projects must include strong participation from all related stakeholders, emphasizing landowners, residents, businesses, managers, resource users, non government organizations, other community groups, schools/academia, and tribes. Strategies need include these stakeholders in planning, assessment, education, prevention, implementation, monitoring, and in gaining financial support. Treatments tools must be safe for the environment and humans.

20 To achieve effectiveness, all BLM Programs/Projects must have a means of support that can insure the level of treatment to achieve the desired level of control. Approach needs

20 con't

to be consistent with the areas customs and culture, as well as be received with acceptance and support by the local community.

21 In conclusion, KFA and Salmon Forever are opposed to the proposed action to use herbicides on BLM lands and recommends that the BLM use alternatives which do not rely on herbicide use. Instead of relying on the proposed use of herbicides, the BLM should affectively manage and treat unwanted vegetation by a variety of non-herbicide techniques including, but not limited to, fire, mechanical, manual, cultural, and biological control methods.

22 We thank you for this opportunity to comment on these documents and look forward to your response. If you have any questions please contact me at – (phone)-530 462 4720, (e-mail) [ptb92day@gmail.com](mailto:ptb92day@gmail.com) or at the address listed in our letterhead.

Sincerely,

Petey Brucker  
For KFA and the Klamath Riverkeeper Program  
And Salmon Forever