

MR BRIAN AMME
PEIS PROGRAM MANAGER
BLM NEVADA STATE OFFICE
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Dear Mr. Amme,

1 Please note the following comments on the PEIS for Vegetation Treatments for Watersheds and Wildlife Habitats on Public Lands Administered by BLM in the Western United States.

ISSUES OF CONCERN:

I. The PEIS does not adequately address the causes of noxious Weed invasion and spread. The focus of the document is too narrow.

A. The main causes of invasive species proliferation are

- 2
1. Roadbuilding
 2. Logging
 3. Livestock Grazing
 4. Off Road Vehicle use

These actions have been excluded for consideration in the PEIS but are major factors affecting the conservation and restoration of native vegetation, fish and wildlife habitat. Fuels/fire management, soil stabilization, and general watershed function were also left out of the picture.

3 II. The PEIS focuses on treating the symptoms of the problem of invasive species rather than the causes that I have mentioned above. The use of toxic chemicals to eliminate invasive/noxious species will compound the problem rather than alleviate it by contaminating soils, water and air.

4 A. Regardless of EPA approval, toxic herbicides proposed for use in this document have not been scientifically proven to be safe. The effects of a few are listed below.

- 5
1. **2,4-D** has been shown to be toxic to
 - a. Birds such as Sagegrouse due to habitat fragmentation and Brewers Sparrows reducing availability of insects which are a part of their diet.
 - b. Fish The toxicity of this chemical to fish is demonstrated by the warning on the EPA label. The toxic effects occur even in low concentrations.

5 Cont

- c. Frogs A recent study from Willamette University shows that 2,4-D interferes with frog sex hormones.
- d. Pets 2,4-D is linked with Bladder Cancer and testicular problems in dogs.
- e. Persistence and Contamination
 - (1) USGS surveys show persistence in agricultural and urban areas, in streams and rivers, and to a lesser extent in wells.
 - (2) People Centers for Disease Control found that about 25% of Americans carry this chemical in their bodies. Levels are higher in children
 - (3) Air USGS found that 60% of air samples collected had this chemical on a national level.
 - (4) Drift Drift problems show this chemical to be one of the top five pesticides involved in drift incidents over 26 states.
 - (5) Dioxin This is a deadly persistent contaminant in 2,4-D. **1**

2. **Glyphosphate (Roundup/Rodeo)**

This is currently the most popular chemical being used in agriculture and on urban and suburban landscapes. Studies have shown this chemical to be:

- a. Carcinogenic to humans in the form of Non-Hodgkins Lymphoma (see references)
- b. Miscarriages in human females
- c. Reduction of male reproductive capacity
- d. Birds This chemical effects the plants birds use for food and shelter
- e. Fish Disruption of Fish immune systems has been shown
- f. Frogs/Amphibians Genetic damage and inhibited development has been shown.
- g. Persistence
 - (1) A regional study in the midwest showed that Glyphosphate applied in spring persisted into the fall harvest season.
 - (2) Contamination has been found in six streams in King County WA-an urban area. **2**

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3. Picloram

This chemical is very dangerous and was evaluated by the EPA in 1995. Both the Ecological Effects Branch and the Environmental Fate and Ground Water Branch of the EPA recommended that the use of this chemical not be continued. However, the EPA did not accept these recommendations.

The Journal of Pesticide Reform of Spring 1998 Vol. 18 #1 with peer reviewed literature referred for citation had this to say about the chemical.

"In laboratory tests, Picloram causes damage to the liver, kidney and spleen. Other adverse effects observed in laboratory tests include embryo loss in pregnant rabbits, and testicular atrophy in male rats. The combination of Picloram and 2,4-D causes birth defects and decreases birth weights in mice.

Picloram is contaminated with the carcinogen hexachlorobenzene, Hexachlorobenzene, in addition to causing cancer of the liver, thyroid, and kidney, also damages bones, blood, and the immune system and the endocrine system. Nursing infants and unborn children are particularly at risk from hexachlorobenzene.

Picloram is toxic to juvenile fish at concentrations less than 1 part per million (ppm.) Concentrations as low as 0.04 ppm have killed trout fry. In Montana, roadside spraying of Tordon killed 15,000 pounds of fish in a hatchery 1/4 mile downstream from the Tordon treatment.

Picloram is persistent and highly mobile in soil. It is widely found as a contaminant of groundwater and has also been found in streams and lakes. It is also extremely phytotoxic, and drift and runoff from Picloram treatments have caused startling damage to crops particularly tobacco and potatoes." 3

Please note the attached citations also taken from the Journal of Pesticide Reform on pg.

4. Inert Ingredients

Inert ingredients of chemicals do not require listing on the label. Health and safety studies are kept secret so the public does not know possible dangers. However, many of these "Inert Ingredients" can add to the toxicity of the product. Included for reference on pg is a list of Inert Ingredients for 2,4-D.

(Journal of Pesticide Reform, Winter 2005 Vol 25 #4 obtained by them through a Freedom of Information Act

request). These ingredients are rarely disclosed to the public.

III Personal Historical Information

9 A. As a resident of Southern Oregon for thirty years, the historical record of aerial spraying of these chemicals is clearly a negative one. In the 70s, extensive spraying of 2,4-D and T,4,5-T have documented many health effects of coastal Oregon residents that resulted in a number of lawsuits. The controversy that resulted, led to the suspension of use of these chemicals by public land agencies except in small localized applications. There is no justification for the program the PEIS proposes except to support the chemical industry.

10 B. Forest practices have evolved since those days. No longer are hardwoods (a major target for historical spray use) on public lands considered a weed. Many are retained on the landscape after logging operations. Although further ecological progress remains to be made in current forest management, the reduced herbicide use has eliminated a very important negative impact on our forests and streams.

11 In conclusion, it is very important to eliminate the true causes of invasive species spread rather than compound the problems by treating the symptoms. These applications will certainly not improve the wildlife habitat and may be extremely harmful to the soils (where they persist), the water, and animals and humans that use the land.

Thank you for your consideration.

SUSAN DELLES



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REFERENCES

Journal of Pesticide Reform/Journal of Northwest Coalition for Alternatives to Pesticides(NCAP)/PO Box 1393/Eugene/OR/97440

The following peer reviewed information is taken from this Journal and included under the following topics:

1. 2,4-D

Winter 2005.Vol. 258. NO. 4 pg 16; also list of 2,4-D Inert Ingredients on pg 12

2. Glyphosate

Winter 2004. VOL. 24. NO.4 pg 15; also list of Glyphosate Inert Ingredients on pg 11

3. Picloram

Spring 1998. VOL. 18 NO. 1 pg 20; also see introduction to fact sheet on pg 13 quoted on pg 3 of this paper

4. Responding to a Chemical Goliath

Fall 1998. VOL. 18. NO. 3 pg 2 included at the end of this section.

