

.....

# Colorado County Weed Supervisor Association

December 19, 2005

Brian Amme, Vegetation EIS Project Manager  
Bureau of Land Management  
P.O. Box 12000  
Reno, NV 89520-0006

Dear Mr. Amme:

1

The Colorado County Weed Supervisors Association (CCWSA) would like to submit the following comments on the *Draft BLM Vegetation Treatments Using Herbicides Programmatic EIS*. We represent county weed supervisors across the state of Colorado. The majority of our membership works directly with the local BLM staff on noxious weed management and has experience with the impact of noxious weeds on both public and private property.

2

We are opposed to limiting the use of herbicides, limiting the number of acres treated to the current level, banning aerial applications, and using only mechanical methods as proposed in the alternatives A, C, D, and E. These alternatives are not acceptable as they will lead to difficulty controlling weed infestations, an increase in the spread of invasive species onto private lands and into wilderness areas, increased environmental impacts from dust and soil disturbance and, most important of all, limited control of new populations of invasive weeds that could otherwise be eradicated.

3

The CCWSA supports Preferred Alternative B, expanding the herbicide list and the acreage to be treated, and allowing the BLM to more rapidly add new herbicide technology to their toolbox. Limiting the choice of herbicides or weed control techniques limits the success of invasive weed control. Using only a few types of herbicides can lead to herbicide resistant weeds (as in Alternatives A and E).

.....

December 19, 2005

Page 2

3  
cont.

Allowing for the tripling of the acreage to be treated is a good start to managing weed problems on BLM land. The agency should have the ability to grow their weed management program as new weed infestations are found and new species are identified. Alternative B allows BLM to evaluate and use new products as they become available. As new weed control products are marketed, it is imperative that BLM be able to use that technology as soon as possible.

4

As for concerns of the health aspects of herbicide use, health problems can be prevented when herbicides *are used as directed on the label*. BLM has access to excellent educational materials and training to assure that employees who are applying herbicides are well informed. It is extremely important for each BLM field office to have a supervisor who is certified and who is assigned primarily as a weed manager. This ensures that the applicators are properly trained and knowledgeable. Problems occur when there is insufficient training, supervision and leadership.

Sincerely,



Fred Raish  
President  
CCWSA