



7 January 2006

Brian Amme, Project Manager, BLM
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RE: BLM-PEIS proposal to increase herbicide applications in seventeen Western states

- 1 It is inconceivable to us that the BLM's Programmatic Environmental Impact Statement could possibly conclude that tripling the amount of poisons sprayed on hundreds of thousands of acres of public land is the most environmentally sound way to manage these living ecosystems. This proposal is ill-conceived and the Willits Environmental Center adamantly opposes it.
- 2 This proposal includes the aerial spraying of eighteen different herbicides including: 2,4-D, bromacil, chlorsulfuron, diquat, diuron, fluridone, hexazinone, tebuthiuron, triclopyr and picloram (a poison banned from use by the California Department of Pesticide Regulation); all toxic chemicals known to expose human beings as well as myriad other non-targeted species to unnecessary and unacceptable risks. The proposal itself even admits that herbicide applicators, indigenous people and recreational users would be subjected to dangerously high exposure levels. It is also well recognized that several of these toxic chemicals remain persistent in the environment, are highly mobile and can cause developmental and reproductive dysfunction in fish and wildlife. For the BLM to indiscriminately spray these toxic chemicals over 932,000 acres of land in seventeen Western states is not scientifically or environmentally supportable.
- 3 The BLM's claim that these herbicides are necessary to reduce catastrophic wildfires and to protect ecosystems from invasive weeds is false. In reality, creating a landscape of dead plant matter will only increase the hazard of large scale wildfire. The soil biology on which all plants are dependent
- 4 to be healthy will be destroyed by the use of these poisons. Alternative C in the PEIS makes it very clear how a variety of non-herbicide techniques including controlled burns, mechanical and manual removal, and biological and cultural methods can be used to effectively manage the spread of wildfires and weeds. It couldn't be more obvious that this nontoxic alternative is the most environmentally sound way to manage these ecosystems and would be the BLM's preferred alternative.
- 5 If this PEIS was a legitimate attempt to steward BLM lands in an environmentally responsible way, this heinous proposal would not be an option at all. If the BLM insists on going forward with this proposal, the bureau will certainly encounter legal challenges.

Respectfully,

Diane L. Smalley, secretary for the Willits Environmental Center