

# FREQUENTLY ASKED QUESTIONS

## VEGETATION MANAGEMENT ACTIVITIES USING HERBICIDES DOI-BLM-R050-2011-0001-EA ROSEBURG DISTRICT

### PROJECT DESCRIPTION

**Q. What is the Bureau of Land Management (BLM) Roseburg District proposing to do?**

**A.** The Roseburg District is proposing to update its 1995 noxious weed management Environmental Assessment (EA) to allow the use of 10 additional herbicide active ingredients (clopyralid, diflufenzopyr+dicamba, diuron, fluridone, hexazinone, imazapic, imazapyr, metsulfuron methyl, sulfometuron methyl, and triclopyr) and 4 currently-available herbicide active ingredients (2,4-D, dicamba, glyphosate, and picloram) to treat vegetation. Herbicides could only be applied using ground-based methods. Herbicides could not be used for treating vegetation for livestock forage or timber production.

The proposal would allow the District to use the additional 10 herbicides to treat designated noxious weeds as well as other non-native invasive species. The District would also be able to use herbicides to treat any vegetation in rights-of-ways, administrative sites, and recreation sites to meet safety and operation objectives, and to achieve habitat goals specified in interagency recovery plans or other plans specifically identified as part of recovery or delisting plans, conservation strategies, or conservation agreements for Federally listed and other special status species.

In addition, the District may be allowed to use new herbicides that may be developed in the future after they are approved for use by the National BLM.

**Q. How many acres would be treated annually using herbicides?**

**A.** The number of acres treated with herbicides is not expected to increase significantly from the current program of work. Approximately 2,000 acres would be treated annually, although the number of acres treated annually would be based on available funding, weather, and vegetation condition.

**Q. Where would the proposed actions occur?**

**A.** Treatments using herbicides could occur anywhere within the 425,000 acres administered by the District, although most treatments would occur along roads, rights-of-ways, and rivers, and on recreation and other administrative sites in the District.

**Q. Will the EA include herbicide treatments in Wilderness Areas, Wilderness Study Areas, along Wild and Scenic Rivers, and other areas that are part of the BLM National Landscape Conservation System?**

**A.** Yes, since they are included in the project area. These units will be analyzed as part of the broad treatment area to the extent that conservation and restoration project work, including invasive and noxious and other weed treatments, are allowed by the individual National Landscape Conservation System proclamations.

**Q. How is this project different from what the District is already doing?**



**A.** The District is currently only able to use four herbicides (2,4-D, dicamba, glyphosate, and picloram) and only to treat noxious weeds. Also, the BLM has been unable to use herbicides to control vegetation within road, power line, pipeline, and other rights-of-way and facilities, and to treat vegetation near plant and animal species of concern. Under the proposed action, the District would be able to use 10 additional herbicides, and would be able to treat other weeds and invasive vegetation in rights-of-ways, administrative sites, and recreation sites to meet safety and operation objectives, and to achieve habitat goals to benefit species of concern.

**Q. Since the District has been controlling noxious weeds for over 20 years using just four herbicides, are the new herbicides really needed?**

**A.** For many plant species, there is no effective means of control currently available to the District. Non-herbicide treatment methods, such as manual, mechanical, and biological control methods, are generally ineffective over large areas or in remote locations, while the four herbicides currently available to the District do not provide effective control for many noxious and other weeds and invasive species. The 10 additional herbicides proposed for use would provide the BLM with better control over noxious weeds and other invasive vegetation while reducing the risks to the human environment from the use of herbicides.

**Q. What new herbicides does the District want to use, and what types of vegetation would be treated?**

**A.** The District is most interested in using clopyralid to treat knapweeds, teasel, and thistles, imazapic to treat medusahead rye, metsulfuron methyl to treat blackberries, sulfometuron methyl to treat medusahead rye and non-native grasses, and triclopyr to treat a variety of weeds and invasive species. Currently, the National BLM is evaluating the use of three new herbicides—aminopyralid, fluroxypyr, and rimsulfuron.

**Q. Where would most of the herbicide treatments occur within the District, and how much land would be treated aerially?**

**A.** Most of the treatments would occur along roads, rights-of-ways, and rivers, and on recreation and other administrative sites in the District. Herbicide application would be done using ground-based application methods, including use of hand-applicators and sprayers pulled by vehicles. There would be no aerial application of herbicides on the Roseburg District.

**Q. Does the BLM use other treatment methods, besides herbicides, to manage vegetation in the District? If so, will the EA analyze the effects of these treatments?**

**A.** Although the focus of this EA is on the use of herbicides to treat vegetation, herbicide use is only one of several methods used by the District to treat vegetation. Other treatment methods used by the District include manual, mechanical, and biological treatments, and fire use. Herbicides are used only after considering the effectiveness of all potential methods, and may be used in combination with other methods.

The EA will include some discussion of the effects of other treatment methods, especially when used in conjunction with herbicide treatments (e.g., prescribed fire followed by post-burn herbicide treatment). The effects of non-herbicide treatments have been evaluated previously in several Environmental Impact Statements.

**EA DEVELOPMENT PROCESS**

**Q. Why is the BLM developing this EA?**

**A.** The BLM is preparing an EA to analyze the site-specific effects of herbicide use on BLM lands in the Roseburg District, Oregon, as one of several tools to control noxious and other weeds and



invasive vegetation to achieve landscape health objectives. This EA will replace the District's 1995 EA that evaluated the use of four herbicides to treat noxious weeds.

**Q. What is the purpose of the EA?**

A. The EA will: (1) provide a comprehensive analysis of BLM conservation and restoration activities involving the treatment, modification, or restoration of vegetation, fish and wildlife habitat, and watersheds; (2) provide a comprehensive National Environmental Policy Act (NEPA) document for use by local BLM field offices for local land-use planning; (3) serve as a baseline cumulative impact assessment; and (4) assess human and environmental health risks from the use of herbicides.

**Q. Is the EA a land-use plan?**

A. No, the EA is neither a land-use plan nor an amendment to a land-use plan. It will not determine land use on the public lands and will not address specific agency management decisions developed under local land use plans.

**Q. I understand that the BLM prepared an EIS to evaluate noxious and other weeds and invasive vegetation treatments on BLM-administered lands in Oregon. Why does the BLM Roseburg District now need to prepare an EA?**

A. To address the treatment of noxious and other weeds and invasive vegetation in Oregon, the BLM recently completed a *Vegetation Treatment Using Herbicides on BLM Lands in Oregon Environmental Impact Statement* (State EIS) and Record of Decision (ROD) that addressed the use of up to 17 herbicides in Oregon. However, the ROD was a programmatic decision, and specific projects could only take place after site-specific analysis and decision making at the field level. The EA is providing the site-specific analysis at the field level.

**Q. Are all the BLM Districts in Oregon preparing EAs, or just the Roseburg District?**

A. All of the nine BLM Districts in Oregon are preparing EAs to evaluate the site-specific impacts from treating noxious and other weeds and invasive species treatments in their district. While these efforts are occurring simultaneously, each effort is district-specific and each district will identify treatments appropriate for their district.

**Q. I understand that only 14 herbicides will be allowed for use in western Oregon and herbicides will not be applied aerially, while up to 17 herbicides can be used in eastern Oregon and most can be applied aerially. Why is this so?**

A. The State EIS did not allow for use of bromacil and tebuthiuron west of the Cascades because of the limited need for these herbicides and their potential to move to nearby streams and adversely affect aquatic resources. Chlorsulfuron was not proposed for use west of the Cascades because most of its target weeds are found east of the Cascades. Aerial application is prohibited west of the Cascades because the high density of rivers, streams, and other water bodies, coupled with the dense vegetation, can make it difficult to avoid water when applying herbicides aerially. Nearly all lands are within source water protection areas for public water systems and there are many individual domestic water intakes in the region. There are also fewer noxious and other weed and invasive species monocultures that are amenable to aerial treatments.

**Q. Who is developing the EA?**

A. The BLM Roseburg District is leading the project, supported by BLM technical resource specialists in BLM offices throughout Oregon. AECOM, a third-party contractor, will prepare the EA in accordance with BLM guidelines and oversight.



**Q. Are there any other federal agencies involved in the effort?**

A. There are no other Federal agencies involved as cooperating agencies; however, the project is being closely coordinated with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, and consultation (under the Endangered Species Act) will be completed as appropriate.

**Q. Are Tribal, State, and local governments involved in the EA process?**

A. The BLM will coordinate closely with Tribal, State, and local governments throughout development of the EA. Much of the treatment work done by the BLM is contracted through State and local agencies that conduct their own treatments on lands adjacent to or near BLM-administered lands.

**Q. How much has been done so far, and what is the next step?**

A. The planning effort began in January 2011. District offices have spent the past few months determining the types of treatments they may need to conduct over the next 10 to 15 years, including types of vegetation to be treated, herbicides to use, and potential treatment areas. They have also looked at alternative actions to treat vegetation on district lands. The districts are currently engaging the public to discuss these potential vegetation treatments, issue identification, and ideas for alternatives.

**Q. When is the EA scheduled for completion?**

A. The Draft EA is scheduled to be completed in January 2012. The Draft EA will be released to the public for a 30-day comment period. The Final EA should be completed in spring 2012.

**Q. How long would this EA last?**

A. It is anticipated that this EA would cover vegetation treatment activities on the District for the next 10 to 15 years, or until circumstances change substantially.

**POTENTIAL ISSUES TO BE EXAMINED IN THE EA**

**Q. Does this EA involve controversial issues?**

A. It is anticipated that most public scrutiny will focus on issues associated with the use of herbicides to control noxious and other weeds and invasive vegetation. Specific issues to be addressed in the EA include the effects of herbicides on human and environmental health; threatened and endangered and other special status species; resources used by Native Americans; and on water resources, including drinking water quality.

**Q. What issues will this EA not cover?**

A. The EA will not address vegetation management that is primarily focused on commercial timber or other forest product enhancement and use, livestock forage enhancement and use, abandoned mine land reclamation, and energy production. The EA will not analyze fire suppression operations and soil stabilization, except where related to vegetation treatment. The EA also will not make land use allocations, or evaluate off-road vehicle use of BLM-administered lands.

**Q. Will there be an assessment of risks to the public and the environment from the use of herbicides?**

A. A risk assessment was done to determine the likely risks to humans and plants and animals from the treatments involving new herbicides proposed for use by the BLM as part of a national programmatic EIS that looked at BLM vegetation treatments in 17 western states, including Oregon. The State EIS used this information when evaluating the risks from using herbicides at the State level. The EA will use this information to evaluate the risks to humans and plants and animals from projects proposed at the field level.



**Q. What are the risks to endangered and threatened species and other species of special status, and what is being done to protect these species from herbicide treatments?**

A. As part of the risk assessments done at the national level, the BLM evaluated the risks to threatened and endangered species, and other special status species. The BLM used very conservative assumptions when evaluating risks to these species, and worked closely with the Environmental Protection Agency, U.S. Fish and Wildlife Service, and National Marine Fisheries Service, during development of the risk assessments and assessment of the risks to special status species. For the EAs, the BLM is consulting with local U.S. Fish and Wildlife Service and National Marine Fisheries Service offices on measures to protect federally listed, threatened and endangered species. The BLM is also preparing a Biological Assessment (BA) that will provide a detailed analysis of the risks from using herbicides to federally listed threatened and endangered species. This information will be provided to the Services and used during consultation.

**Q. Will any herbicide treatments occur in or near water?**

A. Herbicide treatments could occur in or near water. However, the BLM would only use herbicides approved for use in or near water, would follow label directions, and would follow guidance in the risk assessments, EA, and BA, to ensure that herbicide treatments in or near water do not harm humans, non-target vegetation, or fish or wildlife using aquatic resources. West of the Cascades, the BLM would not apply herbicides aerially, reducing the likelihood of herbicides inadvertently entering water bodies.

**Q. Will the EA include alternatives for treating vegetation and mitigation?**

A. The EA may include alternative proposals for treating vegetation. The EA will include project design features (PDFs) and mitigation measures adopted by the State EIS and Record of Decision that would apply to herbicide treatments in the District. These PDFs and mitigation measures include:

- Preventing weeds from entering the District;
- Early detection and rapid response when weeds are found in the District;
- Re-vegetating disturbed or treated areas with desirable vegetation;
- Using special precautions to protect special status species, wilderness areas, and cultural and historic resources;
- Monitoring treatments for effectiveness;
- Coordinating with partners; and
- Educating the public as to the benefits and potential risks from using herbicides and other treatment methods.

**Q. How will the public be notified that the BLM is proposing to treat an area with herbicides?**

A. When the BLM proposes to treat vegetation adjacent to private land, the adjacent landowners will be contacted directly.

**Q. Will the District be able to use new herbicides that become available in the future under this EA, or will a new EA have to be prepared to evaluate the potential impacts from the new herbicides?**

A. The State EIS included a protocol developed by the National BLM that describes the process the BLM must follow to evaluate new chemicals that may be developed in the future, prior to their use by the agency. These herbicides could only be used if they are: (1) registered for use by the EPA; (2) used for treatment of appropriate vegetation types and at application rates specified on the label directions; and (3) determined to be safe to humans and the environment based on a toxicological and environmental impacts analysis of the herbicides by the BLM.



## PUBLIC INVOLVEMENT

**Q. When will the public be able to make comments on the project?**

- A.** The public will have several opportunities to discuss this project with the BLM and to make comments, such as:
- During public scoping in June through July 15.
  - By submitting comments through additional public comment period associated with the Draft EA.

**Q. How can the public comment on the project?**

- A.** The BLM will be seeking public comments on this planning effort throughout the scoping period, which begins on June 15 and runs through July 15, 2011. Comments on the Roseburg District EA can be submitted by mail to: Susan Carter, District Weed/Invasive Plant Coordinator, Bureau of Land Management, Roseburg District Office, 777 Garden Valley Road, Roseburg, Oregon, 97471; by electronic mail (email) to [or100mb@blm.gov](mailto:or100mb@blm.gov); by facsimile to (541) 440-4948; in person at the Roseburg District BLM office; or at the following public meeting:

**Open House - June 27, 2011 from 4:00 pm to 6:00 pm at the BLM Roseburg District Office**

Written comments should be received by July 15, 2011, to ensure consideration. The public will also have the opportunity to comment on the proposal during public comment periods associated with the Draft EA.

**Q. What will be done with these comments?**

- A.** The comments will be compiled and summarized by major resource areas and issues in a scoping summary report. Public comments, and the scoping summary report, will be used to evaluate issues and concerns associated with the proposed program, and to develop alternative programs to treat vegetation on BLM-administered lands. Alternative programs could involve vegetation treatment using fewer herbicides than are currently proposed by the BLM, or different amounts of acres treated using each herbicide.

**Q. How can I find out more about the project, review the earlier EISs and EAs, and follow the progress of the EA?**

- A.** Information on the status of the EA and supporting information is posted on the District website at <http://www.blm.gov/or/districts/roseburg/index.php>.

