THE Scotts Miracle-Gro COMPANY

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Brian Amme
Project Manager
Bureau of Land Management
U.S. Department of the Interior
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

The Scotts Miracle-Gro Company (Scotts) appreciates the opportunity to comment on the Bureau of Land Management's (BLM) draft "Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic EIS (PEIS) and Programmatic Report" that analyzes the effects of using herbicides for treating vegetation on public lands in the western United States, including Alaska. Scotts is the world's leading supplier and marketer of consumer products for do-it-yourself lawn and garden care.

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The PEIS is intended to inform BLM's decision on which EPA-registered herbicides will be available to BLM to improve the agency's ability to control unwanted vegetation, reduce the risks of wildfires, and improve the health of federal forests and rangelands. We support BLM's preferred alternative (Alternative B) as the best means by which the agency can accomplish its objectives. Alternative B provides BLM land managers with maximum flexibility to choose herbicides that best match treatment goals and application conditions. It also allows for future use of newly-developed active ingredients that could be effective at lower use rates and thus could help reduce the overall amount of herbicides applied to public lands.

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Although we understand that continued or increased use of herbicides on public lands is a controversial issue, we do not believe that banning all herbicide use (Alternative C) is good public policy. This approach would severely hamper BLM's ability to control unwanted vegetation, which would likely lead to the spread of invasive plant populations that could damage native vegetative species. When used properly, herbicides are effective tools for building healthy plant communities. BLM should retain its ability to use herbicides in accordance with its standard operating procedures that ensure that risks to human health and the environment are minimized.

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We also do not believe that eliminating BLM's ability to use acetolactate synthase-inhibiting (ALS) herbicides (Alternative E) is wise. ALS herbicides are effective at low doses, have not been found to be more toxic to soil organisms than other herbicides, and pose few risks to aquatic organisms. For example, the aquatic formulation of imazapyr is capable of controlling

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a number of aquatic or riparian weeds. It is currently used by the BLM for the control of salt cedar in the New Mexico Chico Arroyo watershed.[1] Salt cedar is a riparian invader that is
5 particularly difficult to control. Because the half-life of imazapyr in water is two days, if applied to vegetation in zones where the soil is either inundated, or periodically inundated but moist, revegetation can occur very quickly. Pole and stem cuttings, which require contact with water, should be unaffected by site preparation treatments with imazapyr. Furthermore, at such low application rates, soil residual activity should be of little concern, if site preparation is performed as recommended in the summer, fall, or early winter before grass seeding.[2]

In addition, the efficacy of imazapyr for grassland restoration has been documented and
6 BLM should include this information in its PEIS. Masters and Nissen ,[3] Masters et al.,[4] and Stougaard et al.[5] evaluated the utility of imazapyr and other imidazolinone herbicides for the restoration of Great Plains grasslands and leafy spurge-infested rangelands. These studies demonstrated that imazapyr and imazethapyr are superior to glyphosate and atrazine, which are also used in the restoration of these areas. The imidazolinone herbicides provided excellent control of noxious weeds such as leafy spurge, musk thistle, Canadian thistle, and spotted knapweed. Application of these herbicides led to the rapid re-establishment of native grasses (big bluestem, switchgrass, and little bluestem) and selected forbs (blackeyed-susan, purple prairieclover, Illinois bundleflower, trailing crown vetch, and upright prairie coneflower).
7 Masters and Nissen demonstrated that imazapyr was an essential component of treatments applied before planting to facilitate establishment of highly productive stands of tall grasses (big bluestem, indiangrass, and switchgrass).[6] Yields of the planted grasses when imazapyr was applied were consistently greater than when glyphosate or no herbicide was applied. In addition, the control of cool-season grasses and leafy spurge with imazapyr was also consistently greater than those treated with glyphosate alone. Based on these studies, the imidazolinone herbicides

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[1] Bureau of Land Management. 2002b. Environmental assessment for the treatment of saltcedar and other noxious weeds in the Chico Arroyo watershed. U.S. Department of the Interior, Bureau of Land Management, Albuquerque, New Mexico Field Office. EA NM-010-02-032.

[2] Hoag, C., S. Wyman, G. Bentrup, L. Holzworth, D. Ogle, J. Carleton, F. Berg, and B. Leinard. 2001. Users guide to description, propagation, and establishment of wetland plant species and grasses for riparian areas in the intermountain west. USDA NRCS, TN Plant Materials NO. 38. 46 pp; Smith, B. and D. Prichard. 1992. Management techniques in riparian areas. U.S. Department of the Interior, Bureau of Land Management. Technical reference 1737-6. 44 pp.

[3] Masters, R. and S. Nissen. 1998. Revegetating leafy sprurge (*Euphorbia esula)*-infested rangeland with native tall grasses. Weed Technol. 12:381-390.

[4] Masters, R., S. Nissen, R. Gaussoin, D. Beran, and R. Stougaard. 1996. Imidazolinone herbicides improve restoration of great plains grasslands. Weed Technol. 10392-403.

[5] Stougaard, R., R.A. Masters, and S.J. Nissen. 1994. Leafy spurge (*Euphorbia esula)* control with imidazolinone and sulfonylurea herbicides. Weed Technol. 8:494-498.

[6] Masters, R. and S. Nissen. 1998. Revegetating leafy sprurge (*Euphorbia esula)*-infested rangeland with native tall grasses. Weed Technol. 12:381-390.

(including imazapyr) would be effective for restoring grassland to native species. BLM should not preclude its option of using imazapyr for effective control of noxious weeds and restoring grassland to native species.

Very truly yours,

David M. Aronowitz