

January 6, 2005

Bureau of Land Management  
Nevada State Office  
Attn: Brian Amme, EIS Project Manager  
1340 Financial Blvd.  
P.O. Box 12000  
Reno, NV 89520-0006

See FL-0005

Dear Mr. Amme:

I am writing to comment on the BLM's "*Vegetation Treatments Using Herbicides Programmatic Environmental Impact Statement*" and on the "*Vegetation Treatments on BLM Lands Programmatic Environmental Report.*" These comments are made on behalf of the Nevada Department of Agriculture Noxious Weed Program.

We support the Preferred Alternative, Alternative B, as outlined in the *Programmatic Environmental Impact Statement*.

With invasive vegetation and noxious weeds already being the dominant vegetation on an estimated 35 million acres of public lands, it is clear that Alternative A, continuing current practices, is unacceptable. Those are the practices that led to this high level of established invaders. The majority of lands in Nevada are managed by the BLM and it is imperative that they are allowed access to the use of all tools available to control invasive plants.

Alternative C, no herbicides used, would speed the rate at which noxious weeds take over our public resources and endanger the communities, wildlife and recreation that depend on them.

Alternatives D and E also unnecessarily limit the control tools available to BLM's on-the-ground managers, who best know local site conditions. Herbicides approved under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) are applied specifically to produce beneficial net results and are among the most regulated substances on earth. Managers who are trying to protect and restore our public lands and resources should not have fewer tools available to them than their counterparts on private lands.

We also support the protocol for identifying, evaluating and using new herbicides. It is possible that science and industry in the near future will produce herbicidal tools that are safer and more effective than those available today. Any public policy that does not provide a mechanism for such tools to be evaluated and used if found to be beneficial has obsolescence built into it.

Thank you for the opportunity to comment on these important documents.  
Please do not hesitate to contact me if I can provide additional information.

Sincerely,



Dawn Rafferty  
Noxious Weed Program Coordinator



Tina Kadrmas Mudd  
CWMA and Weed Free Forage Program Coordinator