

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

Re: Draft Vegetation Treatment Using Herbicides on BLM Lands in 17 Western States Programmatic EIS (PEIS)

Mr. Amme:

January 7, 2006

1 Desert Survivors is a non-profit desert conservation organization based in Oakland, California. Desert Survivors has an interest in the lands governed by the Bureau of Land Management (BLM) in all states of the United States. Desert Survivors leads educational and recreational excursions on Bureau of Land Management lands, including those proposed to be treated by methods described in this PEIS, as part of its responsibility as a California public benefit, non-profit corporation. Desert Survivors has an interest in seeing BLM lands, both Wilderness and non-Wilderness, continue in a natural and pristine condition. Desert Survivors has 726 members.

2 I have reviewed your *Draft Vegetation Treatment Using Herbicides on BLM Lands in 17 Western States Programmatic EIS* (PEIS) concerning the proposed use of herbicides on public lands governed by the Bureau of Land Management. As President of Desert Survivors, I offer the following concerns about this plan. It is the contention of Desert Survivors that applying herbicides to our nation's public lands will create damage to humans, plants and animals that far outweighs any public benefit that can come from this. "Purpose and need" is not proven in the PEIS, it is merely assumed.

3 Desert Survivors objects strongly to the use of these herbicides on our public lands. Desert Survivors supports the NO HERBICIDE USE ALTERNATIVE.

4 1. **The non-existent "threat" of "noxious weeds"**. Many of the "noxious weeds" referred to in the PEIS have been around for many years and do not pose a threat to life, whether human, plant or animal. The fostering of a "noxious weed threat" is a weird form of mass hysteria that the BLM simply repeats and repeats in an attempt to propagandize. Effects of these "noxious weeds" are 'way overblown in the PEIS and are not adequately proven. The BLM should drop the "noxious weed" propaganda and get back to its

5 work of protecting our lands from the most noxious weed of all, the human predator who is after the resources and will do anything noxious that it has to do to rip it off, namely the miner, rancher, timber-cutter, off-road vehicle operator, military trespasser, water stealer (e.g Las Vegas), and poacher. Treating 932,000 acres with herbicides is not going to solve the basic problem of resource deterioration that the BLM faces daily. The BLM does not prove any danger from "noxious weeds" in its PEIS. Data alleging this danger is either inadequate or non-existent.

6 2. **"Catastrophic fire danger" is also mass hysteria.** Fire has been apart of Western ecology for millions of years. Most of the vegetation is fire-adapted. The BLM is reacting to spectacular news reports and awe-inspiring real-time photos of military spray machines and smoke-jumpers, but really the millions of dollars the BLM spends on fires is wasted. Natural fire cleanses the landscape. Putting out fires interrupts this process and results in larger fires from the larger amounts of fuels that result from the fire being extinguished. A better way to deal with fuel buildup is to let the fires burn, thus eliminating the problem. The real difficulty comes from the rural community and BLM fire professionals, both of whom have come to depend on the fire program for summer employment. These socio-economic drivers of the fire program are not dealt with in the PEIS, but they should be. Using herbicides is not going to solve the fire problem. Letting the fires burn will do this for you.

7 3. Herbicide chemicals proposed to be used are hazardous to wildlife, non-pest plants and humans.

All of the chemical herbicides mentioned in the study are harmful. This includes 2,4-D (the active ingredient in Agent Orange), bromacil, chlorsulfuron, diquat, diuron, fluridone, hexazinone, tebuthiuron, and triclopyr. Obviously systemic herbicides, all of which are Frankenstein-like chemical compounds concocted in a laboratory and specifically designed to kill, should not be used where humans and wildlife are present and natural vegetation grows. | Studies presented in the PEIS do not even begin to shed any light on this matter. Studies done by herbicide manufacturers are worthless; they are obviously self-serving. The long-term effects of all of these chemicals are lethal. That has been brought forward in many studies on fish and amphibians, as well as humans. Studies of residues in soils are inadequate. The use of these chemicals should not even be considered by the BLM.

9 Does the BLM have data from any recent controlled comprehensive studies of what happens to herbicides or herbicide residues after application? Do you have any data on the persistence of same in either groundwater, foliage or other plant materials, or in soil at the sites treated in the past? Such studies would have to go on for two, five, ten or twenty or fifty years, so we may see if the water, soil, plants or animals are contaminated, for how long, and in what way. Are you conducting such studies now? When will they be completed? Are any studies designed to test these subjects on BLM lands now? If so, Desert Survivors would like learn of such studies and see the results.

10 Without any data, the allegation that there is no danger from these substances remains exactly that, an allegation. And I am not referring to studies done by pesticide manufacturers, which have an obvious bias. I am referring to studies actually performed by public agencies **ON THE GROUND**. We need to see what happens to the land, its water, its plants and its animals, when these substances are applied. At a time when school districts, neighborhood groups and municipalities are challenging the California State Department of Transportation ("Caltrans") when it applies pesticides to every roadside, our citizens should expect no less of the BLM on our public lands.

11 It is not necessary to be a BLM operative or a weed control specialist to find out about the dangers of these herbicides. A quick trip to my local hardware store revealed the following. From the label on "Roundup": "Do not apply directly to water; do not contaminate water; when disposing of equipment wash waters; never pour down any drain." An advertising slogan on the bottle reads, "For control that won't wash away!" "Enforcer", a concoction of triclopyr and other compounds, states the following: "Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the high tide line." Even the manufacturers acknowledge that contact with their products is not a good thing for water, riparian areas and wildlife! When in doubt, read the label!

12 On their hikes, Desert Survivors members and others often drink from water sources found in Wilderness and elsewhere on BLM lands. Water is vital to life and desert water is sacred. These water sources are among the purest on the planet, unfouled by domestic livestock or human agricultural or industrial pollution. It is positively diabolical to apply herbicides to these waters or to any water sources that have "dried up". | The herbicides and their break-down residues are dangerous to both animals and humans, and the application of these pesticides to water sources or riparian vegetation is a criminal act. All the more so because there is no notification, no signs at the water sources, no "skull and crossbones" danger signs erected at "treated" sites. If these herbicides or their break-down products get into the groundwater at a "treated site", such pollution of the groundwater is impossible to remove, and the water source and its downstream waters then become toxic. | Our members will be directly impacted by the BLM's actions if herbicides are applied to public lands and the herbicides or their residues get into the groundwater. Your agency will be creating a grave danger to both animals and humans if you proceed with this evil plan.

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If even one hiker develops cancer or liver disease from the herbicides you are applying, the cost you are imposing already far outweighs any benefit gained by the agency. Your volunteers, BLM staff, prisoners and work crews do not use the desert and do not have to drink the water while hiking. Desert Survivors and other hikers do. Your PEIS does not take into account the bad effects of what you are proposing on hikers and backpackers and the tourist community — a glaring error.

15 4. **What you propose as necessary treatment to the land can be performed by means other than herbicides.** In all cases, there are other means that can be used to manage public lands in a responsible manner. Spraying herbicides is a kind of “final solution” management tool that seems to solve one problem but ends up creating more. “Fly a plane over and the work is done!” But at what cost? These chemicals must not be used on public lands.

16 Your herbicide spraying program fails with respect to all four “public benefits” touted on your website. It does not “reduce wildland fire risk”, it increases it. It does not “improve vegetation condition”, it kills vegetation. It does not “improve fish and wildlife habitat”, it kills fish and wildlife. It does not “improve watershed condition”, it pollutes the watershed. This proposal to use herbicides on public lands must be eradicated.

17 Please send me a paper copy of the Draft PEIS so I may study it in detail. CD copies and the website post are a pain in the ass because they take so long to print. You should be providing paper copies of these documents at government expense so the public can become more thoroughly involved in your decision-making process. Also send me a paper copy of the Final PEIS when it is completed.

18 Also instructive would be a listing of campaign contributions and/or bribes made to the Bush campaign and those of other Republican office holders by chemical companies and/or herbicide manufacturers. There has been a rash of proposals for use of herbicides and pesticides on our public lands since the advent of the current administration, and it is likely that influence from chemical companies and/or herbicide and pesticide manufacturers is responsible for this. Such research, which is publicly available, would help the public immensely in its effort to evaluate the need for these types of programs. Most observers accept the corruption of the Bush Administration and its kowtowing to corporate interests as a given, but we need to know the details. This information was left out of your PEIS. It is the most important information that we need to judge the significance of this herbicide-spraying program. Send me this information as soon as you can.

Desert Survivors appreciates the opportunity to comment on this PEIS. I look forward to receiving your response.

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Sincerely,



Steve Tabor, President

Desert Survivors

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