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To

12/19/2005 01:50
PM

cc

Subject

Herbicides out west

Subject: Comment on BLM Programmatic EIS for pesticide Vegetation
Treatments
in 17 Western States

Brian Amme, Project Manager
BLM, P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

1 I have reviewed the Bureau of Land Management's proposal to study pesticide applications to public lands in western states. I am urging BLM to use pesticides only in minimal amounts for research purposes, not as a large-scale management strategy. In particular, aerial spraying will likely

have the most negative impacts on non-target vegetation and wildlife, as well as tourists and native peoples. With any large-scale applications, these chemicals are known to drift much further than anticipated and cause unexpected health and ecological impacts. The pesticides that would be used include persistent and mobile chemicals, including known developmental and reproductive toxins. Recent research on amphibians has shown that these same

2 pesticides can cause developmental abnormalities and mortality at concentrations formerly thought safe, such as 1 part per billion. I assume you are aware of the recent literature in this area (E.g., research of Tyrone Hayes, Rick Relyea). If not, please feel free to contact me for references at cpicone@fsc.edu.

3 I teach environmental science and am quite aware of the need to manage invasive plants and fire hazards. However, risk from large-scale application of pesticides - the unknown risks - are likely to outweigh the known, controllable risks from invasives and fire. Moreover, negative

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feedbacks in ecological communities are likely, with time, to eventually control invasive plants. We may lose some biodiversity along the way - and that is nothing short of a tragedy - but a soil covered by invasive plants is still healthier and less prone to erosion than a bare soil treated with large-scale herbicides. Moreover, such bare-soil conditions only promote more invasive species.

Thank you for consideration of public comments.

Sincerely,

Chris Picone
(Formerly of Salina, KS)

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