

Comments - B.L.M. Vegetation Treatments & Environmental Report

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First, I would like to applaud the B.L.M.'s efforts to expand their ability to address some large-scale vegetation related conditions that exist on federal public lands under their administrative responsibilities. The current programmatic processes to address these conditions do not meet the scope of the problem, nor does it systematically provide adequate opportunities to reduce an ever-expanding degradation of these natural resources.

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As an invasive plant management professional, I would have to say that while the need to perpetually review, scrutinize, and monitor the herbicides which are approved for use on the B.L.M. administered lands is very important; I believe that the technical reviews done to satisfy the environmental safety standards for product use labeling by the E.P.A., should be used to lessen some unnecessary review responsibilities on B.L.M. resource managers. It seems possible that by building stronger cooperative efforts between the B.L.M., E.P.A., and the product manufacturers, many of the environmental concerns could be addressed during the product labeling approval process. The manufacturers of these products dedicate vast amounts of energy and money to ensure that the products they are providing will meet the societal scrutiny, and limit any potential environmental liability that exists related to product usage. Improved collaboration between these entities would seem to be a logical consideration. Detailed analysis of both the inert and active ingredients contained in the proposed products early on in the review process, by external specialists may also provide a platform for improved modeling techniques. The development of standardized risk assessment tools for the purpose of meeting the NEPA requirements should be created in such a fashion that it could be adopted by all governmental agencies. This should reduce the existing duplication by the various federal agencies with environmental responsibilities.

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The economic dynamics associated with developing these environmental policies alone, should dictate that by leveraging corporate funding to assist in the review process, would allow for reduction or redirection of taxpayer-based funding to support program implementation of the much-needed land improvements. The increasing demands being placed upon public land resources to provide diversified opportunities to the general public, necessitate elevating the levels of stewardship being applied to mitigate the negative impacts of these activities. The costs associated with meeting these responsibilities are also increasing, and therefore; the pursuit of ecologically sound, cost-effective management programs is a must.

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