Frances Lamberts, 113 Ridge Lane, Jonesborough, TN 37659

January 6, 2006

Mr. Brian Amme, PEIS Program Manager
Bureau of Land Management
Nevada State Office
PO Box 12000
Reno, Nevada 80520-0006

Vegetation management treatment on BLM lands: EIS

Dear Mr. Amme:

1 I recently studied, and responded to, an Environmental Assessment for Interior department lands somewhat close (and dear) to me, the Great Smoky Mountains National Park, specifically the Park managers' proposal for use of Imidacloprid to control an invasive insect pest that could threaten the survival of the Park's hemlock trees. I strongly sympathize with the dilemma our public-lands managers face as they seek to deal with the problems for native vegetation and wildlife, from exotic invasive species that appear to be spreading rampantly in many places. Allow me to express my appreciation to your Agency for seeking appropriate and effective treatment methods, and for soliciting public input in this endeavor.

2 However, I have serious concerns about several matters, mostly (1) the enormous scale of Proposed Action, e.g. herbicide application to almost a million acres, mechanical treatments to 2 ½ million acres more, (2) cost of herbicides relative to other, especially biological-control or "passive" treatment methods, (3) likely harm to much vegetation and insect and other animal wildlife from toxic, or from coarse mechanical treatments applied on this scale, and (4) seemingly little attention being paid to the causes through which invasive pests get carried into our landscapes and "promoted," as it were, through creation of conditions that favor their spread.

3 It is well known that land clearing and disturbance, such as forest clear cutting and road building serve to both let weed species "get in" and the resistance capacity of the native ecosystem to be weakened. In contrast, as forestry research has repeatedly documented, when large, native forest stands are left intact (or managed/harvested with minimal canopy breaks and soil disturbance), they can and do act as physical barriers to bio-invasive species, even halting the spread of these to adjoining lands. This, preventive effect operates in grass land, scrub-vegetation, wetlands and other ecosystems your Agency administers and must protect for the future: the more that the native vegetation and native insect predators are disrupted, eliminated or weakened, the better is the chance that noxious invasive species will thrive.

4 I therefore urge the Bureau to pay greater attention to causative, land-disturbing activities--range overgrazing, excessive off-roads motoring, forest clearance, mining, roads proliferation and the like--in preference to treatment through mechanical eradication and herbicides. The latter types of treatments cannot be truly effective, it would seem, unless the causes of noxious weeds proliferation are addressed. I recommend, to this effect, that the Bureau consider choice of the Restore-Native-Ecosystems alternative in the Programmatic EIS.

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5 I have some familiarity with research on biological and human health effects of pesticides (Dr. Pimentel's and other papers, for example). Because of documented, very high ecological costs associated with pesticide use, I strongly urge against principal reliance on these for treatment of such large areas as are specified in Proposed Action. Pesticides might be justified where their application is localized and well controlled (as through soil injection around individual hemlock trees in the GSMNP) and used transitionally only, to allow biological and ecosystem restorative treatments to take effect.

6 I am aware that procurement of pesticides can be multiple times more costly, in financial terms, than procurement of biological treatment agents, while their unwanted, harmful impacts on public health and our environment (e.g. bird and fisheries losses, water contamination, pollinator insects and other losses) run into the billions of dollars every year. From the taxpayer viewpoint, therefore, the less costly alternatives are certainly preferable, especially as they redress causative ecosystem disturbances and are more effective in the longer term.

7 Again, with my deepest appreciation for your efforts in regards to the public lands, I urge that vegetation management to control noxious invasive species focus on ecosystem protection and restorative activities, rather than on large-scale pesticide application or other, symptomatic treatment forms.

Sincerely,

Frances Lamberts

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