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EMC0475
see FL0004

From: Don L. Schroyer P.O. Box 201 North Pownal Vermont 05260

Subject: COMMENTS for Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States. Programmatic Environmental Impact Statement

PROFESSIONAL EXPERIENCE

30 YEARS experience as a professional Consulting / Industrial Forester.
8 YEARS licensed as a Qualified Supervisor in the Colorado Noxious Weed Program.

Comments

Having worked as a Colorado licensed Qualified Supervisor (QS), I have seen the environmental, economic and personal impact of unchecked noxious and invasive weed species. In the southeastern most area of Colorado (U.S.F.S. & Private Lands), entities continue to intentionally hinder, delay, obstruct or ignore the processes necessary to control, contain or eradicate foreign, detrimental and injurious plant species.

Sound science and modern technology offers ways to make well, many millions of acres nationwide. The expertise, dedication and hands-on experience of those like BLM and the licensed Qualified Supervisors of Colorado, can make good things happen.

To hinder, delay or obstruct the use of scientifically tested and Agency approved herbicides and application techniques, would eliminate a segment of *Integrated* Weed Management (IWM). The negative environmental, economic and personal impact would be compounded exponentially much faster than most realize.

Traveling across the country and residing in eastern areas, has been proof that the western States have excelled in the responsible and scientific approach to noxious weed management. Colorado Qualified Supervisors are one of the forerunners, with in their fourteen (14) year endeavor.

Alternative A No Action Alternative

With BLM lands experiencing an onslaught of unacceptable plant species, as recognized by many State, Federal and Local Government Authorities; *Alternative A "No Action Alternative"* employ's no science or good logic. It would be an irresponsible alternative. It excludes all tools and efforts that are crucial to deal with the endless noxious and invasive weed problem.
I cannot support "*Alternative A".*

Alternative B Expand Herbicide Use and Allow for Use of New Herbicides

The amount of "active ingredient" applied to any amount of acreage, is a concern to all. As new herbicides become available, older less effective agents, which dictate a larger volume of "active ingredient", can be replaced or temporarily discontinued. The newly tested and Agency approved materials may afford more acreage to be managed more responsibly at a permissible cost.
I staunchly support *"Alternative B".*

Alternative C No Use of Herbicides

There will always be a proper place within IPM for mechanical, biological and physical control of a limited number of noxious and invasive weed species. However, to date, due to the tenacity of many perennials species, these acreages must remain limited. BLM as well as other State, Federal and Private Managers, will not begin to reverse the adverse influence of noxious and invasive species without the aid of herbicides. Alternative C "No Use of Herbicides" does not realistically address the severity of the problem.
I cannot support *"Alternative C".*

Alternative D No Aerial Applications

Terrain, limited access, cost-effectiveness and vast acreages are a few things that mandate the use of aerial application. State of the art spray equipment technologies along with GPS navigation and highly skilled airmen insure more accuracy and better distribution of spray material than ever before. It has been proven through extensive research and monitoring, that aerial application can be 30% to 40% more effective per ounce of active ingredient than other spray methods. Although air application may seem to be a dangerous profession for the individual flying, manual and ground application demands a much larger workforce, which can result in more unfortunate injuries and risks. The possibility of material spills, skips and overlaps may increase as the numbers in a workforce increase. There is a greater chance of any workforce on the ground, inadvertently doing damage to sensitive areas or possibly spreading noxious weed seed outside of an infested area.

I strongly oppose prohibiting aerial application.

Alternative E No Use of Acetolactate Synthase-inhibiting Herbicides
Emphasis on passive restoration:

The ability to do a superb job, many times, depends on the number of tools that are available to the skilled. Eliminating or restricting the use of approved Acetolactate Synthase-inhibiting Herbicides eliminates a tool from Integrated Pest Management, Best Management Practices and the recovery process of infested lands. There are exotic plant species that are presently resistant to particular herbicides. Varying the herbicide that is used on particular parcels of land and the proper use of Acetolactate Synthase-inhibiting Herbicides can help deter exotic plant species from becoming resistant to a single product.

I strongly oppose *"Alternative E"*

Human Health Concerns and Herbicide Use

The proper use of any herbicide is dependent on education, training, experience and adhering to the product label; "The Label is the Law !". The BLM Staff members that are "Certified" by the various State & Federal Laws have proven their expertise through their knowledge and examination, to select and/or apply herbicides in accordance with "The Law", thus rendering as little risk possible, to human health. If BLM, at this late date, do not have "Certified" members at each field office, I suggest they do so promptly. It is essential they maintain someone in a Supervisory capacity that is Certified and acting as a Weed Manager.

Federal, State, County and Local governments have the avenues of the Memorandum Of Understanding (MOU) or InterGovernmental Agreement (IGA) to procure the assistance of established expertise i.e. Qualified Supervisors (QS) as in the State of Colorado or others.

NOT COVERED / ADDITION TO FINAL EIS NEEDED

Early Detection & Rapid Response (EDRR) is a fundamental and essential tool to eradicating an exotic weed specie. According to "Appendix D", the time factor to secure a new herbicide could be two plus years. If a new herbicide is necessary to promptly eradicate this new specie, two years time would not constitute EDRR. There MUST be an approved procedure for EDRR in regard to herbicide use.

Respectfully,

Don L. Schroyer
1 February 2006