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

1 I have been in my position with the Diamond Valley Weed District for 5 years. We work closely with the BLM, Eureka Conservation District, Eureka County and private land owners. In our integrated pest management program the use of herbicides is necessary and carefully planned, monitored and recorded. For example; we are involved in an extensive re-vegetation project in an area that is a vital buffer zone to a riparian corridor. A monoculture of noxious weeds needs to be replaced with desirable vegetation. There is no way for desirable vegetation to compete with established noxious weeds without herbicides. Herbicides give desirable vegetation time to establish and ultimately result in discontinued use of herbicides. These projects have to be consistent throughout the area whether it is private or public lands. Discontinued use of herbicides would make this project impossible.

From here down
see FL-0004

Proper use of the most effective herbicide for a specific vegetation treatment does result in decreased use of herbicides over the long term. Herbicides are rarely needed where limited or infrequent stress is put on an intact plant community. However, the introduction of invasive plants, a disrupted fire cycle, overgrazing and drought have resulted in fragmented desirable plant communities. To rehabilitate and increase total acres of resilient native plant communities, herbicide use must be an option for any integrated vegetation treatment program. A national policy that does not approve herbicide use, restricts use of ALS inhibitor herbicides or does not allow aerial application under any circumstance severely limits the ability to improve and rehabilitate infested land.

As mentioned before limiting or stopping use of herbicides on BLM lands will result in greater economic hardship for neighboring properties (federal, state and privately owned) as wildfires, invasive plants and erosion problems know no boundaries.

I strongly support the approval and implementation of Alternative B, as it makes available the most comprehensive set of tools to address the threat of invasive plants on BLM lands.

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

Although greater acres will initially need to be treated under this alternative, the newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied in these acres for control of numerous weed species. The product imazapic will result in more resilient plant communities that will not require annual herbicide treatments. Addition of the two new aquatic products will allow rapid response to any aquatic weed problems. Loss of old herbicide chemistry such as 2,4-DP, asulam, atrazine, fosamine, mefluidide and simazine is acceptable.

The other alternatives listed in the Draft BLM EIS do not provide adequate solutions to the ecological and economic threats caused by invasive plants. Therefore, I do not support them.

APPENDIX D PROTOCOL FOR IDENTIFYING EVALUATING, AND USING NEW HERBICIDES

Overall, I support this protocol. However, one change should be made to increase its effectiveness.

“Determining the Need for New Herbicides” requires an additional valid reason for considering approval of a new active ingredient along with “to expand availability of the number of substitute products to avoid resistance”. It is understood that this could be covered under *“but are not limited to:”*

NOT COVERED / ADDITION TO FINAL EIS NEEDED

PEIS is in need of a section addressing Early Detection and Rapid Response (EDRR). In Appendix D, the process to secure a new herbicide can take more than two years. This is unacceptable for problems that require EDRR. There **MUST** be an approved procedure for EDRR in regard to herbicide use.

The PEIS is also in need of a section addressing the development of sustainable fuel breaks in brush and grasslands in an effort to return wildfires to historical size and impact, as well as to protect private property, critical habitat areas and newly revegetated or rehabilitated sites. Suppression of fire should be a last resort; prevention through fuel breaks and proactive fuel management through vegetation treatments should be the first priority.

Sincerely,



Ellen Mariluch