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From: Western Society of Weed Science (WSWS)
Phil Banks, President

Date: February 9, 2006

Re: Comments for "Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States. Programmatic Environmental Impact Statement."

The Western Society of Weed Science (WSWS) is pleased to have this opportunity to comment on the proposed "Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States". The WSWS is a non-profit association of approximately 400 academic research, extension, government, and industrial scientists as well as a number of weed management practitioners representing eighteen western U.S. states, including all of the seventeen states affected by the proposed management plan. Our stated objectives are to: foster and encourage education and research in weed science; foster cooperation among state, federal and private agencies in matters of weed science; aid and support commercial, private and public agencies in the solution of weed problems; support legislation governing weed management programs and weed research and education programs; and support the Weed Science Society of America and foster state and regional organizations and agencies interested in weed management.

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The WSWS is very concerned about the impact of invasive weeds on the continent's natural areas. The spread of noxious weeds has been considered by the U.S. Department of the Interior to be analogous with a biological wildfire. As with wildfire management, a variety of treatments or techniques must also be available for management of weeds. These include prevention, early detection, timely control (biological, physical, chemical, or cultural), and site rehabilitation. The selection of the most appropriate control methods is influenced by land management objectives; effectiveness of the control technique on the target species; environmental factors; land use; economics; and the size of weed infestations. An integrated weed management (IWM) approach that gives equal consideration of all management tools, including herbicides, is critical for managing extensive weed infestations.

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The **WSWS strongly supports Alternative B,** expand herbicide use and allow for use of new herbicides in the 17 western states. Herbicides must remain a management tool for invasive weeds. The WSWS supports the continued responsible use of established reliable herbicides as well as the addition of newer, scientifically advanced chemistries that have been developed during the last 13 years. Proper use of the most effective herbicide for a specific vegetation treatment will result in overall decreased use of herbicides. Herbicides are rarely needed in a healthy environment where limited or infrequent stress is placed on an intact plant community.

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It is important to note the exclusion of risks associated with non-chemical alternatives mentioned in this alternative. There is no mention of the risk to workers using mechanical, fire or other methods to control invasive plants particularly in Alternative C: No Use of Herbicides. This ignores the dangers to workers using these methods such as the inhalation of vehicle exhaust or smoke from prescribed fires, risks associated with fire escape, physical injuries from over-exertion or injuries as a resulting from operation of heavy equipment. In Alternative D: No Aerial Applications, it should be noted that aerial applications of herbicides are often the method of control that offers the least disturbance to an area. Mechanical methods, as is mentioned in the PEIS, will often disturb the ground cover which opens the area to new weed infestations, and actually facilitates the spread of invasive plants into new habitats. Also in this alternative it is mentioned that the most sensitive factor for aerial applications is the potential for spray drift. This assumes that the application will be made with a liquid spray solution; however, there are granular formulations of many herbicides which greatly reduce or eliminate drift onto non-target areas.

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One implication for Alternative B that may cause concern is that the use of herbicides around Threatened & Endangered (T&E) species is always harmful to the organism. However, the judicious use of herbicides can benefit T&E species by controlling noxious and invasive weeds that adversely alter habitats making them less suitable for T&E organisms. There are herbicides that control specific noxious or invasive plants (selective herbicides) without harming T&E species. Generalizations that herbicides should not be used around T&E species ignore the potential value of herbicides to help restore T&E habitats. In addition, the spread of invasive plants is a greater threat to some T&E species than the use of a selective herbicide. For example, use of herbicides that control sensitive invasive broadleaf species could be used around T&E grass species. Both Dr. Rod Lym, North Dakota State University, and Dr. Joe DiTomaso, University of California, have conducted field research that support this beneficial effect of herbicides in improving or preserving T&E habitat quality. Additionally, some measure of unintentional damage to T&E species should be articulated where non-herbicidal approaches are taken. Mechanical removal of invasive plants will likely disturb habitats and possibly physically damage T&E species.

The WSWS strongly oppose all other alternatives:

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- Alternative A: No change from current EIS
- Alternative C: No use of herbicides
- Alternative D: Alternative B without aerial application of herbicides
- Alternative E: No use of present or future AHAS inhibitor herbicide

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A national policy that does not approve herbicide use or does not allow aerial application under any circumstance **will not result in improvement** or rehabilitation of infested land. Consequently, limiting or stopping use of herbicides on BLM will result in greater economic hardship for neighboring properties (federal, state and private) as wildfires, invasive plants and erosion problems have no boundaries.

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The **WSWS also supports the developed Appendix D**, "Protocol for Identifying, Evaluating and Using New Herbicides" to facilitate evaluation and addition of new chemicals as they become available in the future. However, the process outlined for approval of a new herbicide or for a new use of an existing herbicide is lengthy. A more rapid response to use of new herbicides may actually assist with eradication efforts if an invasive plant is found in a non-infested area. Waiting two to three years for use of a herbicide that has been registered by the US EPA would appear to be inconsistent with the mandate set forth in the 1999 Executive Order 13112, which is to prevent the introduction of invasive species, provide for their control, and minimize their economic, ecological, and human health impacts. As you are aware, the executive order required the formation of an Invasive Species Council comprised of a number of federal agencies, including BLM, which was tasked to complete a ***National Invasive Species Management Plan***. On page 6 of the Plan the Council is tasked to lead, ". . . development, testing, transfer, and training concerning use of environmentally compatible pesticides and herbicides in controlling invasive species." On page 36 "The Council will review and propose revisions of policies and procedures (i.e., advance approval for quarantine actions, pesticide applications, and other specific control techniques, and interagency agreements that address jurisdictional and budget issues)." New herbicides provide opportunities for a rapid response to new infestations of invasive plants when they are relatively small in size. Failure to use US EPA approved herbicides early in the invasion cycle will likely lead to use of larger amounts of herbicides to control the invasive plants once their population has expanded. Rapid response is effective in eradicating invasive plants before they spread. We encourage the BLM to consider a way to respond more rapidly to the use of new EPA registered herbicides.

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The WSWS also supports a section that addresses development of sustainable fuel breaks in the brush/grasslands in an effort to return wildfires to historical size as well as protect property, critical habitat areas, and newly revegetated or rehabilitated sites. Suppression should be a last resort and prevention as fuel breaks and pro-active fuel management as vegetation treatments should be a first priority.

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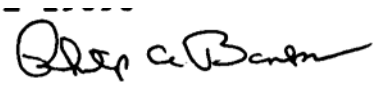
Thank you for considering our comments to the proposed “Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States”. Members of WSWS are concerned with the management of vegetation on BLM lands since the majority of acres managed by the BLM are located in our region. The WSWS stands ready to assist the BLM in any way with the assessment and institution of scientifically sound weed management practices on public lands. This letter has identified some issues that are very important to our members. Please let me know if you have any questions or comments about our response.

Sincerely,



Phil Banks, President WSWS