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RE: Comments on the Programmatic Environmental Report (PER) For Vegetation Treatment on Bureau of Land Management Lands and Programmatic Environmental Impact Statement (PEIS) for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States

- 2 Please find attached BP America's comments to the subject documents. BP is a major leaseholder within the Rocky Mountains and operates thousand of wells on federal acreage. BP is the leading producer of natural gas in North America and a global producer and manufacturer of oil, natural gas, petroleum products and petrochemicals. The company is also internationally recognized as a leader in environmentally responsible operations and corporate transparency.
- 3 BP applauds the efforts by the Bureau of Land Management (BLM) to understand the processes through which vegetation changes occur and how attempts to manage these changes are important to overall effective environmental management as represented by the PER and PEIS. It is our understanding that the primary objective of these documents is
- 4 identification of herbicides suitable for use on public lands and the PER does not address energy production activities as stated on page 1-6 and the PEIS also does not address energy production as stated on page 1-4. Both documents, however, have the potential to influence the important and innovative public lands restoration work that BP is committed to do as part of our commitment to land stewardship. For these reasons, we believe comments on some of the alternatives being analyzed should be submitted.
- 5 Alternative B – Expand Herbicide Use and Allow for Use of New Herbicides in 17 Western States (Preferred Alternative). BP agrees that this alternative is desirable to allow a full

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cont.

range of treatment options to be utilized to achieve desired vegetative parameters. Herbicide use is not the only vegetation management tool, but it is an important component of an integrated approach to the very real threats that many non-native plants present to the WUI, native western vegetative communities, and the wildlife that rely on them.

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Alternative C – No Use of Herbicides. Without a huge increase in field staff, this alternative would greatly hinder vegetation management. Many weed species (e.g. *Tamarix*, *Halogeton*) seem to require herbicide use to obtain effective control.

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Alternative E – No Use of Sulfonylurea and other Acetolactate Synthase- inhibiting Active Ingredients. This alternative correctly points out that the PEIS is subordinate to FLPMA.

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We also feel that monitoring and adaptively making changes based as warranted during reclamation is an important component of an effective management, and encourage expansion of this aspect of the PER. Execution of a project's monitoring plan provides the feedback necessary for the ongoing stewardship activities that will ultimately bring about the desired goal set. Designating resources at project initiation to steward restoration activities through time is vital to project success. Our experience has shown the added expense is quickly cost justified by positive project results.

Thank you for considering our comments.

Sincerely,
Dave Brown