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Mr. Brian Amme
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Re: Draft Programmatic Environmental Impact Statement (PEIS)
VEGETATION MANAGEMENT PLAN FOR 17 STATES

Dear Sir or Madame:

1 BLM's Draft Programmatic Environmental Impact Statement (PEIS) reels off page after page of minutely-detailed descriptions, obscure citations and widespread contradictions to conclude with the result wanted by BLM from the beginning: An irrevocable commitment of $1.1 billion annually to dump toxic chemicals scientifically known harm the water, soil, air and all life forms from the largest mammals to microscopic organic decomposing organisms.

2 BLM unfairly limited the time to comment on their boondogle, but from what I have seen, it sounds like there is a lot of spaghetti and meatballs going around here.

3 The draft EIR Vegetation Management Plan For 17 Western States should be scrapped and a new plan created based on a policy of environmental stewardship putting habitat restoration ahead of BLM's planned illegal toxic dumping.

4 Firstly, I take exception to the amount of time allowed for public comment.

The initial notice of a 30-day public comment period was extended to a 60-day public comment period.

Even a 60-day public comment period is insufficient for the public to satisfactorily ascertain the risks with a $1.1 billion annual BLM plan calling for the brewing of a toxic stew in a kettle of porous public lands and related airborne, groundwater, riparian habitats.

5 BLM's justifies its wish list of chemical compounds by saying thousands of jobs will be created, but avoids any commitment to comprehensive stewardship of the land.

6 BLM's position in strong support of the Vegetation Management Plan For 17 Western States amounts to internal lobbying by government officials.

7 BLM statements are internally inconsistent, and ignore known scientific facts about the toxicity and hazards of the chemicals BLM is calling for.

8 If BLM is permitted to carry out the Vegetation Management Plan For 17 Western States, people will be hurt, employees, visitors, travelers and nearby residents and any livestock with increased cancer risk, health problems, on-the-job injuries and monetary losses.

For example, BLM asserts that "Accidental scenarios involving dermal contact with a sprayed waterbody or a waterbody into which herbicide was spilled did not result in risk to swimmers." (second paragraph preceding Table 4-27). This statement is a lie and in conflict with proven medical consequences of the nine active ingredients (2,4-D, chlorsulfuron, clopyralid, glyphosate, hexazinone, imazapyr, metsulfuron methyl, picloram, and triclopyr) desired by BLM.

9 Further, BLM submits no contingency for the foreseeable consequences resulting from a combination of the nine active ingredients (2,4-D, chlorsulfuron, clopyralid, glyphosate, hexazinone, imazapyr, metsulfuron methyl, picloram, and triclopyr) likely released in the toxic spill on BLM land.

10 BLM relies on the 256-pages of Chapter 4 entitled "Environmental Consequences" to hide the truth: Vegetation Management Plan For 17 Western States will harm people, animals, plants, trees, shrubs, bushes and the microscopic lifeforms which are required to maintain homeostasis in the outdoor environment.

11 For example: "Direct spray of 2,4-D results in moderate risk to small mammals at both the typical and maximum application rates, assuming 100% absorption of the herbicide. Small mammals face low risk from direct spray, assuming 1st order dermal absorption. Adult wild horses and burros may face less risk of direct spray than young wild horses and burros because they have a smaller surface area to volume ratio over which to absorb the herbicide. Direct spray impacts to wild horses and burros can largely be prevented if animals are removed from target areas before spraying 2,4-D. In addition, wild horses and burros face risk from the consumption of vegetation contaminated by 2,4-D at the application site: large mammals face moderate acute and chronic risk at both the typical and maximum application rates and small mammals face low acute risk at the typical and maximum application rates. Large wild horses and burros that primarily consume grasses are particularly susceptible to risk from the vegetation consumption scenarios. However, long-term consumption of contaminated vegetation may be unlikely if the vegetation

11 cont. shows signs of damage. The risk assessment suggests that because large wild horses and burros eating large quantities of grass and other vegetation could be at risk from routine exposure to 2,4-D and because 2,4-D is considered for use in rangeland, this herbicide should not be applied over large application areas where foragers would only consume contaminated food." (Chapter 4, "2,4-D")

12 "Moderate Risk" is acknowledged by BLM. Moderate risk means a substantial certainty of toxic effects for their planned use of 2,4-D.

13 BLM officials are asking for it by name: They want Overdrive®, a herbicide which BLM admits is used to contaminate plants consumed by wildlife.

14 BLM claims "Overdrive® poses low chronic risk to large mammalian herbivores that consume plants contaminated by direct spray at the typical application rate and a moderate risk at the maximum application rate (ENSR 2005i).

15 BLM acknowledges "Overdrive® is proposed for use in rangelands and does have moderate residual activity, wild horses and burros may be at risk from the application of this chemical, particularly if it is sprayed throughout the range area (an unlikely scenario). The use of Overdrive® in rangeland could benefit wild horses and burros by controlling unpalatable invasive plant species and promoting the establishment and growth of native plant species that may be more suited for forage."

16 "Moderate Residual Activity" is acknowledged by BLM. Moderate means a substantial certainty of toxic effects for their planned use of Overdrive®.

17 BLM skirts the issue of harm to human life with respect to Sulfometuron methyl.

18 "Sulfometuron methylapplications do not present risk to **any** receptors when applied in routine use situations at either the typical or maximum application rate. Accidental scenarios involving dermal contact with direct spray or vegetation or dietary exposure were not calculated because sulfometuron methyl has not been shown to have acute dietary or dermal effects in hazard analyses conducted by USEPA." (second paragraph preceding Table 4-27). A "hazard analysis" under USEPA standards are tests of a very limited scope. The fact is application Sulfometuron methyl has made people sick and resulted in job-ending disability in many instances.

19 BLM's wish list contains more than 1,000 separate toxic chemical compounds present within the brand-name pesticides, herbicides and fungicides BLM proposes.

20 BLM's language to describe the environmental consequences of the draft EIR probably comes directly from the warning labels, instruction labels and disclaimer language provided by the manufacturers of these harmful, toxic products.

21 BLM knows the chemicals are hazardous but seeks carte blanche to dump toxic chemicals on public land while offering only watered-down suggestions at limiting the application of hazardous substances.

22 "Mitigation for Herbicide Treatment Impacts The following actions would greatly reduce the risk of herbicide applications to livestock:

- Apply diuron, glyphosate, hexazinone, tebuthiuron, and triclopyr at the typical, rather than maximum, application rate to minimize risks to livestock.
- Do not apply 2,4-D, bromacil, dicamba, diuron, Overdrive®, picloram, and triclopyr across large application areas, where feasible, to limit impacts to livestock, particularly through the contamination of food items, or remove livestock from application areas for an appropriate period of time, as specified on the product label.
- Where feasible, limit glyphosate and hexazinone to spot applications in rangeland to avoid contamination of food items.
- Do not aerially apply diquat directly to wetlands and riparian areas.
- Do not apply bromacil and diuron in rangelands and use appropriate buffer zones (see Vegetation section in this chapter) to limit contamination of off-site rangeland vegetation."

23 BLM never acknowledges its responsibility under the law to insure these hazardous chemicals are used safely because BLM cannot insure these hazardous chemical are used safely. BLM wants to bring in thousands of workers into environmentally-sensitive habitats and abdicate control over substances which constitute a threat to national security.

Stop the BLM plan.

Yours very truly,

Jack Neff