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Brian Amme
BLM PEIS project manager
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Dear Mr. Amme,

1 Thank you for providing extended opportunity to comment on the Vegetation Treatment draft EIS and Report. As a western weed scientist and farmer member of the Idaho Farm Bureau, I affirm the serious need for increased efforts for management of undesirable vegetation on rangelands, and concur wholeheartedly with each of the American Farm Bureau recommendations.

2 I support the BLM's choice of Alternative B. I disagree with alternatives A, C, D and E, each of which provides inadequate management. Alternative A has allowed increase in invasion by alien species (p.)Alternative C, D and E indiscriminately omit the use of efficient technologies in sites appropriately safe for their effective use.

3 Alternative C, no use of herbicides, flies in the face of sixty years of beneficial use of various herbicides on BLM lands.

4 Alternative D seeks to eliminate the very real risk of off-target drift of herbicides, but ignores the fact that there are places where aerial application is the only feasible means, and that many such places are amenable to safe use of aerial applications. Although accidental drift has caused adverse off-target effects, frequency and severity of such incidents has not been shown to be more detrimental than effects of different kinds of accidents related to other management practices.

5 Alternative E, in perceiving the past misuse of potent ALS inhibitors, wrongly presumes that ALS inhibitors are categorically inappropriate, and paints with too broad a brush. The invalidity of the "passive restoration" espoused by E (p. 2-12,13) is evidenced by decades of progressive dominance by aggressive invasive species on BLM land.

6 This draft suggests a possible disparity between the extent of the problem and the extent of the proposed treatments. It states that 35 million acres are dominated by invasive species (p. ES-1), and 6 million acres are proposed for annual treatment (p. ES-2, 1-6), but not whether or how the proposal is to treat in some way the entirety of the infested acreage. The draft describes the problem and focuses on analyzing and comparing the treatments, and discusses "programs, policies and methods" but stops short of explaining how the BLM will actually handle the 35-million-acre problem. The final draft or decision should address this deficiency.

7 Use of biological controls, including grazing animals (p. 2-12-13), is well summarized, but omits a significant point. The draft fails to acknowledge that, even though the weeds may be significantly suppressed, biological controls do not prevent seed dispersal and expansion of infestations, and their use therefore does not protect adjacent areas against invasion, and does not constitute compliance with the noxious weed laws of most states. This omission should be corrected.

8 Interrelationships, coordination and cooperation with other agencies, including state agencies, and numerous federal laws are mentioned, as is the responsibility of local agencies to control weeds on public land, but nowhere is mention of BLM's intentions regarding compliance with state noxious weed laws in the 17 western states. The final draft should make that clear.

9 The text in Vol. 2 under "Non-Target Species Effects Characterization", "Terrestrial Species Effects Characterization", on page C-28 of volume 1, says that "response of weed species to sulfometuron-methyl may be more severe than for crop species". Weed scientists familiar with the herbicide, as well as experienced BLM practitioners, would recognize that as an oddly erroneous, misleading suggestion; it should be corrected.

10 The draft EIS correctly points out the propensity of sulfometuron-methyl to injure sensitive crops, but fails to identify ways to manage risks posed by this exceptionally phytotoxic herbicide; it does deserve more attention than most other highly potent herbicides. Failure to exercise such cautions is the reason for the reaction against all Sulfonylurea herbicides. Whereas the unusual potency of sulfometuron, picloram, and certain other herbicides the BLM proposes to use, is such that they deserve authoritative prescriptions and extraordinary attention to job specifications to avoid injury to off-target crop species, their use should not be abandoned. There are thousands of acres, particularly in isolated temperate desert and steppe regions, in which these could be aurally applied without endangering crops, but a quarter-mile upslope from row-crop farms is not among them. I recommend that the final decision address administration of the use of such tools.

11

The draft EIS wrongly implies that all ALS inhibitor herbicides are of comparable phytotoxicity (e.g. table 2-8; Vol 1 p. 4-115). They vary greatly in level of phytotoxicity and in spectrum of selectivity; the document should point out that fact.

12

No RQs or LOCs were cited or suggested for even one agricultural crop species; those crops are not so much as named in the document, though nearly 300 other plant species are, on pages A-1 to A-6; nor does the document acknowledge them even to the extent of mentioning exclusion of consideration of risks to crops. Perhaps this is because the preparer considered agricultural species of little significance in the environment, or to put it another way, not of any “special status” such as is designated to the list of nearly 2000 species of plants and animals on pages H-1 to H-44. Considering the close association of many BLM land with sensitive irrigated crops, the BLM’s history of crop injury, and the nearly absolute human dependence on crops, more recognition should have been given to risks to crops of the irrigated West, as well as to ornamentals near farmsteads and urban areas. Granted, the BLM does not, in practice, entirely ignore that risk, but that’s not the point; I recommend that the final draft or decision refer to this matter.

13

Technical errors and omissions mentioned here reflect this draft’s insufficient involvement of personnel having an adequate grasp of weed science in all of its ramifications. Calling weed management “vegetation management” is fine, but changes neither the nature of the problems nor the science needed to address them. My principal recommendation regarding the BLM’s weed management activity is that the agency acknowledge that it is dealing with a specialty, not simply a few elements of that specialty. Proper acknowledgment will warrant more than token involvement of true weed specialists. It takes more than assigning a title to be a specialist. To be well qualified for BLM purposes, weed specialists should have not only experience but also a formal education focused on weed science and technology, including range and forest science. Such personnel are needed not only for development of documents such as this but also for directing related field work. They are the personnel most likely to have not only adequate preparation, but also a basic professional interest and motivation so focused on weed technology that its application will be sound. That basic motivation is not a minor consideration, and it’s not obtained by simply retraining or reassigning personnel from another profession.

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Mr. Amme, I recognize that I may not be doing this document justice in every one of my comments. Although I’ve spent many hours over the past several days going over this 3-volume pile of paper, it is arranged and paginated in a confusing and complex manner, is repetitive and unusually difficult to search, even electronically, so my review was pretty cursory. Anyway, I’ll happily stand corrected if I’ve drawn some erroneous conclusions of fact.

Sincerely,

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