

To: Brian Amme, Project Manager, BLM
P.O. Box 12000, Reno, NV 89520-0006
Fax 775-861-6712
vegeis@nv.blm.gov

From: Sylvia Gillen, State Conservationist
USDA Natural Resources Conservation Service, Utah
Wallace F. Bennett Federal Building
125 South State Street
Salt Lake City, UT 84138-1100

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

Comments

1 The USDA Natural Resources Conservation Service provides conservation technical and financial assistance on private, state and tribal land. This commonly includes vegetation treatments that utilize herbicides. In Utah, we have partnered with the federal land management agencies in an effort called the Utah Partners for Conservation and Development (UPCD). Representatives of the UPCD have agreed to make managing and restoring rangelands a top priority for their agencies and groups. They've also agreed to share resources in an unprecedented initiative to conserve sagebrush ecosystems statewide. Special emphasis is being placed on crucial sage-grouse and mule deer habitats. The BLM's ability to use herbicides as a tool will be crucial to the success of our partnership.

2 The introduction of invasive plants, altered fire regimes, over grazing, and drought are all examples of ecological stressors that have resulted in fragmented desirable plant communities. Many rangeland ecosystems that are healthy are threatened by adjacent invasive plant dominated communities. To rehabilitate and increase acres of plant communities that are resilient to invasive plants through integrated vegetation treatment programs, herbicides must be an option. A national policy that does not approve herbicide use or restricts use of ALS inhibitor herbicides 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 land (federal, state and private) as wildfires, invasive plants and erosion problems know no jurisdictional boundaries.

see FL0004

Alternative A - No Action Alternative

The degradation of BLM land is evidence that *Alternative A* does not provide the tools needed for Hazardous Fuel Reduction programs, Emergency Stabilization or Rangeland Rehabilitation. BLM lands will continue to degrade at an accelerated rate if vegetation treatment continues under alternative A.

I do not support Alternative A.

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

Although greater acres are initially treated under this alternative, the newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied for control of numerous weed species, especially leafy spurge. The product imazapic used on cheatgrass will result in more resilient plant communities not in need of 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, melfluidide and simazine is acceptable.

I strongly support the approval of Alternative B.

Alternative C - No Use of Herbicides

By making herbicides unavailable as a tool for land management, this alternative puts all adjacent lands in great risk, including our National Parks, State lands, private property and Forest Service resources. It also removes the ability of BLM land managers to utilize the latest technology in their efforts to restore healthy rangelands.

I do not support Alternative C.

Alternative D - No Aerial Applications

With today's technology for improved aerial spray techniques (including booms, nozzles, GIS capability), aerial application of herbicides is more targeted, more efficient, creates less impacts/disturbance/drift, and can be more effective than ground applications.

"Greater Drift" impact is minimized by use of selective herbicides and new application technology.

Not all BLM land in need of a vegetation treatment has terrain conducive to ground application. Use of manual or ground application equipment to spray rough terrain can result in herbicide overlap and skips, resulting in either damage to desired vegetation or leaving invasive plants to re-populate the area. Some critical habitat areas are only accessible for vegetation treatment by air. Some invasive plants, such as large stands of saltcedar and Russian olive, are best treated by air when considering an economical and effective treatment. The EIS correctly outlines how aerial application is more cost effective than ground application.

Specifically written bid specifications can help to avoid off target damage, by assuring best aerial application technology and applicators with reputations for accurate applications.

Alternative E - No Use of Acetolactate Synthase-inhibiting Herbicides

Emphasis on passive restoration:

Recent innovations in the use of ALS herbicides such as Arsenal and Plateau hold a great potential to gain a foothold over invasive plants such as cheatgrass and saltcedar that managers have had no feasible option to deal with until now. Removing the use of ALS herbicides for use on public lands will undermine the cooperative efforts that are currently building to manage invasive plants over entire landscapes. This alternative puts all adjacent lands in great risk, including our National Parks, State lands, private property and Forest Service resources. The section of greatest concern is banning use of ALS herbicides.

I strongly appose Alternative E.

**APPENDIX D - PROTOCOL FOR IDENTIFYING EVALUATING, AND USING
NEW HERBICIDES**

Overall, I support this process with one change needed.

“Determining the Need for New Herbicides” requires an additional valid reason for considering approval of a new active ingredient of “to expand availability of the number of substitute products to avoid resistance”. It is understood 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 development of sustainable fuel breaks in the brush/grasslands in an effort to return wildfires to historical size and frequency as well as protect property, critical habitat areas and newly revegetated or rehabilitated sites.

Suppression should be a last resort, prevention through fuel breaks and pro-active fuel management through vegetation treatments should be a first priority.