



PETROLEUM ASSOCIATION OF WYOMING

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Bureau of Land Management
Nevada State Office
Brian Amme, EIS Project Manager
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

RE: Programmatic Environmental Impact Statement (PEIS) for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States

Dear Mr. Amme:

1 The Petroleum Association of Wyoming (PAW) would like to thank BLM for the opportunity to comment on the referenced document. PAW is Wyoming's largest and oldest oil and gas trade association, the members of which account for over ninety percent of the natural gas and over eighty percent of the crude oil produced in the State. This project will directly affect members of PAW.

2 PAW commends the Bureau of Land Management (BLM) in its efforts compile this programmatic environmental impact statement (PEIS). It is our understanding that the primary objective of these documents is identification of herbicides suitable for use on public lands and the report 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 reclamation work that is done by our members in our efforts and commitment to land stewardship.

Alternative B – Expand Herbicide Use and Allow for Use of New Herbicides in 17 Western States (Preferred Alternative)

3 PAW agrees that this alternative is desirable to allow a full 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.

Alternative C – No Use of Herbicides

4

PAW does not support this alternative because we believe it would hinder vegetation management. Many weed species require herbicide treatments in order to effectively control them.

5

Alternative E – No Use of Sulfonylurea and other Acetolactate Synthase- inhibiting Active Ingredients

This alternative correctly points out that the proposed PEIS is subordinate to FLPMA.

6

PAW believes it is important for BLM to do ongoing monitoring and then adaptively make changes as warranted during reclamation in order for effective management to occur. Execution of a project 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 member's experience has shown the added expense is quickly cost justified by positive project results.

Thank you for your time and consideration.

Very truly yours,

/s/ Ericka S. Cook

Ericka S. Cook
Vice President