



January 9, 2006

Mr. Brian Amme
Vegetation EIS Project Manager
U.S. Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520-0006

EMC0309

RE: Comments on BLM Vegetation Treatments Programmatic EIS and ER for the Western U.S.

Dear Mr. Amme:

- 1 The Edison Electric Institute (EEI) appreciates the opportunity to provide comments on the above reference EIS. EEI is the association of United States shareholder-owned electric companies, international affiliates, and industry associates worldwide. Our U.S. members serve 90 percent of the ultimate customers in the shareholder-owned segment of the industry in the western United States, and 63 percent of all electric utility ultimate customers in that region. Our U.S. members also generate 38 percent of all electricity produced in the western United States.
- 2 Many of EEI's member electric utilities operate electric power transmission and distribution lines on lands managed by BLM. As such, EEI supports BLM efforts to reduce the risk of wildfires and to control noxious weeds and invasive plants. EEI also has been working with BLM, Forest Service, National Park Service, Fish and Wildlife Service, and the Environmental Protection Agency to finalize a memorandum of understanding (MOU) to facilitate consistency and timeliness in the processing of utility vegetation management plans for rights-of-way on public lands.
- 3 In addition, EEI is a participant in the U.S. Environmental Protection Agency's (EPA) Pesticide Environmental Stewardship Program (PESP). Through the PESP program, the industry is working with EPA in promoting the use of Integrated Vegetation Management on rights-of-way to minimize overall risk to humans and the environment and while providing safe and reliable electric service. EEI was a recipient of the PESP 2005 Champion award.

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- 4 EEI supports the Bureau of Land Managements (BLM) Preferred Alternative, Alternative B – Expand Herbicide Use and Allow for Use of New Herbicides in 17 Western States. The preferred alternative provides the greatest flexibility toward the goal of the PEIS which is to comply with the National Fire Plan and related initiatives. In any Integrated Vegetation Management program (IVM), as described in Alternative B, the use of a diverse catalog of chemical applications applied in combination with mechanical and cultural practices have consistently been shown to provide the highest degree of successful control of target species while having the least impact to the surrounding environment. This Alternative provides the BLM with the greatest flexibility to meet the goals of the National Fire Plan and related initiatives, as well as provides a means to increase or decrease the scope of this program as new product chemistry becomes available or existing chemistry becomes obsolete.
- 5 Alternative A – the No Action Alternative, is not an optimal alternative as it does not provide a means by which new product chemistry could be evaluated and integrated seamlessly into the current IVM program. This Alternative also does not consider that new populations of invasive species may not be located in the existing 500,000 acres currently treated requiring further NEPA analysis to treat the areas that have been identified. This Alternative would limit the ability of land managers to identify and concisely address potential problems while complying with the goal of meeting the National Fire Plan standards without further NEPA analysis on those areas not previously evaluated.
- 6 Alternative C – No Use of Herbicides, would remove an integral component, pesticides, from the IVM program. This is a crucial component to vegetation control when dealing with, for example, deep rooted perennial species such as Russian knapweed, (*Acroptilon repens*), camelthorn (*Alhagi pseudoalhagi*), or leafy spruce (*Euphorbia esula*). These species are not effectively contained or eradicated by mechanical or cultural controls without the assistance of herbicides which translocate into the root zone.
- 7 Alternative D – No Aerial Applications, would severely restrict the number of acres the BLM could successfully treat using pesticides especially in those areas where terrain features make it impossible to get ground equipment into. This would severely restrict the BLM from attaining the goals of the National Fire Plan and related initiatives.
- 8 Alternative E – No Use of Acetolactate Synthase-inhibiting Herbicides, would reduce the number of acres the BLM could treat annually thus increasing costs and affects of mechanical treatments in the remaining acreages. By restricting the use of this mode of action in the IVM program, it may not be possible to effectively or efficiently achieve the goals of the National Fire Plan and related initiatives.

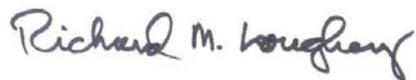
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- 9 In conclusion, EEI believes Alternative B, as the preferred alternative, is the best alternative considered under this PEIS. EEI supports and commends the selection of this Alternative and the efforts of the BLM to address the issue of the use of pesticides on public lands while balancing the need to work within ever decreasing budgets with the mandate to comply with national policy to achieve the goals of the National Fire Plan and related initiatives.

Sincerely,

A handwritten signature in cursive script that reads "Richard M. Loughery".

Richard M. Loughery
Director, Environmental Activities