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Dr. Mr. Amme:

1 I would like to thank the BLM EIS team for their extraordinary efforts in the formulation of the *Vegetation Treatments using Herbicides on BLM Lands in 17 Western States Programmatic EIS* (EIS) and *Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Report* (ER). It is certainly an onerous task and we appreciate your efforts.

2 I write as a private partner with the BLM in the coordination and implementation of a Cooperative Weed Management Area (CWMA) in NE Oregon. A leader in noxious weed management effort, the Vale District BLM has been the seminal and driving force in the formation and maintenance of two CWMA's in our area. We are therefore very much interested in the results of your work and how they will apply to efforts here.

### **Impact of Weeds on the Environment**

3 For the sake of time, I have largely chosen to outline my thoughts in regards to ways to improve the above documents. I am generally supportive of them and their goals and commend the EIS team for the well developed environmental and human risk assessments regarding each herbicide. However, they lack sufficient emphasis on the impact that noxious weeds themselves have on the environment. 4 There is growing body of literature and many all too true stories across the west about the ability of these invaders to cause harm to our environment and the local economies that rely on them. These impacts must be addressed so that the general public can grasp the gravity of the situation and justify the use of herbicides, millions of dollars, and countless hours invested in managing them. 5 Addressing these impacts directly in the EIS and the ER would also help to avoid litigation of these documents and save the taxpayers and the BLM much time and money. Time is of the essence. Thousands of acres are infested each day and permanent damage happens when weeds are not effectively managed. Adding this layer of information now will save time in the long run.

6 Quantifying the impacts that noxious weed can have is also critical to evaluating the environmental impact of each of the alternatives. Stating that X number of

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acres will be treated per alternative implies that there are acres that will not be treated. Without attempting to calculate the impact of those untreated (and therefore spreading) weeds on the landscape, the environmental analysis is incomplete. Similarly, the increase in the cost per acre of weed control by alternative (i.e. due to the lack of ability to use aerial treatments) with budgets that are not connected to need, means less acres are treated. These are environmental impacts that are not well addressed in the EIS.

### **Prevention Measures**

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Another aspect of the EIS that could use more emphasis is the prevention of weeds. While mentioned in the document, it is a critical element of Integrated Weed Management and needs more detail. The use of certified weed free forage and mulch products should be required on all BLM lands and projects. The North American Weed Management Association has developed a program and standards for certifying such products which is easily accessible at their website (<http://www.nawma.org/>). Their standards are very applicable to the Western US.

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The EIS should provide some prevention standards for all activities that happen on the BLM such as road work, grazing, recreational use, and logging (i.e. ATV's). Cleaning equipment, quarantining livestock before entry onto allotments if they are from out of the local area, or having completed a weed education course before being able to ride an ATV on BLM lands are some examples of such measures.

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Finally, prevention standards need to recognize that members of the public who use BLM lands are critical partners in weed control. Prevention standards should not, in general, be penalties of use but rather means with which to enlist participation in the management of noxious weeds.

### **Acetolactate Synthase Inhibitors**

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Please clarify the reasoning behind Alternative E and explain rationale for considering acetolactate synthase-inhibiting herbicides separately from the rest of the herbicides. These chemicals have low environmental toxicities and are becoming very important in the effective and precise control of noxious weeds in the borage and mustard families.

### **Implementation Plan**

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Another area of the EIS that needs clarification is how this document will be put into use on the ground. There was not a clear process outlined as to how the adopted EIS will be used by the districts and management units to go about on the ground work.

### **Aerial Herbicide Application**

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The EIS shows very little cognition of the sophisticated understanding of drift in aerial applications that is available today. Though I cannot give you a reference

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for this type of material I know it exists as I have seen several presentations on the matter. From personal experience I can say that aerial applications can be extremely precise, very small scale, with new technologies and tight application standards impacts of drift can be very well mitigated. New GIS technologies also allow the precise mapping of targets prior to treatment and on board helicopters allow the same technologies accurately map spray swaths.

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### **New Herbicides**

Lastly, I commend the EIS team for providing means to adopt new chemicals over time. This is critical as herbicides are consistently becoming narrower in spectrum and more non-toxic to the environment and to humans. I hope that the EIS team is already working to incorporate Milestone Herbicide into this EIS.

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Thank you for your efforts toward better weed control for the BLM. I hope that the above edits can be incorporated into the EIS. I also wish to express my support for Alternative B – the preferred alternative – as it provides managers with the most complete set of tools to manage noxious weeds.

Sincerely,

Mark C Porter

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