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12/07/2005 12:07
PM

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"Gina Ramos" <gramos@wo.blm.gov>

To
cc
Subject
Fw: Comments on Draft Vegetation
Treatments Using Herbicides on BLM
Land in 17 States PEIS

Please delete the first version of my comments and use the corrected version. Thanks. Hank

----- Original Message -----

From: Hank McNeel
To: vegeis@nv.blm.gov
Cc: Gina Ramos
Sent: Wednesday, December 07, 2005 11:27 AM
Subject: Comments on Draft Vegetation Treatments Using Herbicides on BLM
Land in 17 States PEIS

- 1 I would like to address a few comments in regards to the Draft Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS)
- 2 Volume 1: Abstract, Executive Summary, and Chapters 1 through 8 covered pretty well. However, I feel that a much stronger emphasis should be placed on how the Bureau of Land Management and their cooperators utilize a combination of Integrated Weed Management. I realize that you are mainly covering herbicides in this PEIS but if you do not stress the balanced approach of an Integrated Weed Management Program much of the public will still think that all the BLM does is use herbicides. You need to have a brief on the comparison of different control techniques and methods from the Annual Integrated Weed Management Reports that the Washington Office is supposed to receive from all BLM State Offices annually.
- 3
- 4 Page 5-5 under McNeel it should read MS Plant Science/Weed Science. As my major was Weed Science

Volume 2: Appendixes

5 Appendix D-Protocol for Identifying Evaluating and Using New Herbicides. I support this approach very much as it has long been needed by federal agencies trying to manage public lands.

Abstract, Executive Summary, Chapters 1 through 7, and Appendixes

Page 1 - Terminology

6

Counties can also designate a plant species as a Noxious Weed within their county . Federal Agencies should also be controlling those species within the designated county that declared it noxious. I feel that this should also be included within this PEIS.

Page 2-12, Second Column, Paragraph 3.

7

You should also include duration that domestic animals are in an area by closely watching the stage of utilization of both the target and the non-target vegetation present. Also you need to stress the importance of proper management techniques in this program in order for this practice to work correctly. Often times overall management practices need to be altered in order for any vegetation management practice to be successful.

Page 2-14, Second Column, Paragraph 2, Line 7

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Anyone applying pesticides on BLM lands must be certified whether the pesticide is general or restricted use. Refer to the BLM Manuals 9011 and H-9011-Chemical Pest Control.

9 I support Alternative B (Preferred Alternative).

General Comments

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1. I feel you need to address what would happen to native plant species, wildlife habitat, recreation etc. if no weed control treatments were made on BLM lands.

2. I also feel that the BLM needs to make a much greater effort in making the public aware of this PEIS. The only way I found out about it was when Richard Lee telephoned me to ask some questions about BLM Pesticide Certification. Then I saw the announcement for the public hearing the next day in the Billings Gazette. Some of the BLM Cooperators mainly County Weed Districts did not know until Dec. 6, 2005 that this PEIS was out and the Public Hearing was Dec. 7, 2005 here in Montana. How are you going to gain support from your cooperators and the general public if this occurs.

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12 Thank you for the opportunity to comment on this PEIS. My feeling is that much greater effort needs to be made in proper vegetation management at all levels.

Hank McNeel