

Brian Amme
Vegetation EIS Project Manager
BLM, P.O. Box 12000
Reno, NV 89520-0006

EMC0218

January 6, 2006

Dear Mr. Amme,

1 As Extension Invasive Weed Specialist at Utah State University, and previously as Extension Weed Specialist at the University of Idaho, I've spent nearly 25 years of my professional career studying invasive weeds and observing their impact on rangelands and other natural areas of the West. In 2000 I was appointed by U. S. Secretary of Interior, Bruce Babbitt, to serve on the first National Invasive Species Advisory Committee which was charged with the task of developing an effective national management plan to address the problem of invasive weeds and other harmful species. Attached a short vita which I believe further represents my qualification to comment on the BLM's current draft EIS for vegetation management.

2 It is my professional opinion that Alternative B (Preferred Alternative) is the only reasonable choice offered in the EIS for addressing the current and expanding problem of weeds and related vegetation issues on BLM lands. The other proposed alternatives are not acceptable.

3 Herbicides are essential tools for effective vegetation management. Current EPA safety testing and registration requirements are designed to ensure that when used responsibly (a condition specified in the EIS) herbicides are safe to humans, domestic animals, wildlife, and the environment. 4 It seems utterly foolish to me that the BLM or any other federal land management agency would take upon themselves the role of overseeing or second-guessing the EPA. And yet, that is exactly what BLM is doing by creating its own list of herbicides that excludes site-approved products already deemed safe and effective by EPA. It is my opinion that all herbicides meeting EPA registration requirements for range and/or wildland sites should be automatically approved for use on BLM lands. Alternative B allows use of four additional active ingredients (imazapic, diquat, diflufenzopyr, and fluridone) beyond the currently approved fourteen. But why stop there? Why deny your agency's land managers the use of newer products (such as aminopyralid) that may be even more effective and safe? If the BLM's goals for vegetation management are to decrease invasive and noxious weeds, to decrease the risk of wildfire, and to improve habitat for endangered species, then I'm convinced that arbitrarily limiting or completely eliminating any safe and effective herbicide option (product or application method) for vegetation management is a recipe for eventual failure.

Sincerely,

Steven A. Dewey, PhD.
Professor and Extension Specialist
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