



CALIFORNIA WEED SCIENCE SOCIETY

PO BOX 3073
SALINAS, CA 93912-3073
(831)442-0883 FAX(831)442-2351

January 6, 2006

Mr. Brian Amme,
PEIS Project Manager
BLM Nevada State Office

Dear Mr. Amme,

1

The Board of Directors of the California Weed Science Society would like to provide the following comments regarding the draft Programmatic Environmental Impact Statement vegetation treatments using herbicides on Bureau of Land Management lands in the 17 western states. As practicing weed scientists with a variety of private, public, and academic organizations, we feel that the best integrated vegetation management program requires the availability of all weed control options. In your draft PEIS, you present 5 alternative proposals to change future herbicide use. We agree that alternative B, which expands herbicide use and utilizes the newest herbicides, is the best choice. It critically reviews active ingredients of herbicides, removes unneeded ones, adds needed ones, and keeps the door open to the future. All of the other alternatives reduce your options, and therefore limit your ability to achieve the desired result, the reduction of invasive plants on natural ecosystems in the west. Even though use of some herbicides, such as the als inhibiting chemistries, and the use of aerial application present environmental challenges, these challenges can be mitigated with professional and careful practices that will adequately reduce off target concerns. We know that you have a big job to do to return our public lands to their natural state and we support your choice to keep your weed control toolbox as full as possible with the best tools.

Sincerely,

Carl E. Bell, Secretary, California Weed Science Society

If you would like to know more about CWSS and its Board of Directors, Please visit our website at <http://cwss.org/>