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From: John Knight, jpkdok@yahoo.com

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Subject: COMMENTS for Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States. Programmatic Environmental Impact Statement

1 Thank you for the opportunity to comment on your proposed vegetation treatments using herbicides on BLM lands. I work in California as a forester for the California Department of Forestry and Fire Protection. I also serve on the Trinity County Weed Management Area. These comments are my own. Because invasive species do not recognize jurisdictional boundaries it is important the BLM work cooperatively with state and local groups that share the goal of reducing the environmental damage caused by invasive plants.

2 To meet the challenge of invasive species in California, the BLM should follow a course of action that includes

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1. Strengthen support for California Department of Food and Agriculture programs on prevention, eradication, and education.
 2. Focus on the development of control methods, both chemical and non-chemical.
 3. Enhance support for county Agricultural Commissioners, University of California researchers, Weed Management Areas, and private landowner participation.
 4. Promote efficient and effective control programs and strategies characterized by efforts that prevent invasions and quickly detect new occurrences so that the species may be removed or contained before spreading.

4 I agree with the approval and implementation of Alternative B, as it makes available the most comprehensive set of tools to address the threat of invasive plants on BLM lands. Herbicides used in California should be limited to those approved by the California Department of Pesticide Regulation.

5 To address invasive plants I suggest that the project include an integrated weed management plan. Below is the integrated weed management definition found in

6 Weeds, Article 1.7 Noxious Weed Management. It reads in whole:

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cont.

For the purposes of this article, “integrated weed management plan” means an ecosystem-based control strategy that focuses on long-term prevention of weeds through a combination of techniques, such as biological controls, judicious use of herbicides, modified land management, and cultural practices, and where control practices are selected and applied in a manner that minimizes the risks to human health, nontargeted organisms, and the environment.

This definition would be a good standard to follow regarding the complicated issue of invasive species..

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Once again, thank you for extending the comment period on the environmental impacts of using herbicides on BLM lands.