



California Partners in Flight
Working Together for the Conservation of California's Landbird Habitats

Mr. Brian Amme
PEIS/PER Manager
Nevada State Office
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

EMC0238

January 9, 2006

Dear Mr. Amme:

1 California Partners in Flight (CalPIF) has reviewed the Programmatic Environmental Impact Statement (PEIS) and Programmatic Environmental Report for the **Draft Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States** (the Biological Assessment), and provides the following comments and recommendations.

Recommendation on Planning Alternatives

2 In reviewing the five planning alternatives (Alternatives A through E) presented in the Biological Assessment, CalPIF supports Alternative B (Preferred Alternative) – with recommendations for improvement. We support Alternative B because in our estimation it provides the best balance between minimizing the impacts on land birds and other fish and wildlife which inevitably result from vegetation management actions, with the need for controlling and eradicating non-native and invasive plants that degrade habitats for fish and wildlife. CalPIF believes it is important to maximize the number of acres of invasives treated on BLM lands each year, and Alternative B best achieves that. Alternative B accomplishes the most toward important habitat improvement goals that include (1) reducing the risk of catastrophic wildfire by reducing hazardous fuels, (2) improving ecosystem health by controlling noxious weeds and invasive species, (3) manipulating vegetation to improve habitats for land birds and other wildlife, and (4) improving wetland and riparian areas by removing nonnative invasive plants and restoring native species. Furthermore, CalPIF supports Alternative B because it retains all vegetation management tools available to the BLM so that the choice of treatment for each target area can be evaluated using the most effective combination of chemical, mechanical, and other treatments.

3 In evaluating Alternative E, CalPIF believes the alternative has merit in that it emphasizes alternate treatment strategies and limits the size and extent of herbicide treatments for the primary purpose of minimizing impacts on biota. However, the Alternative reduces the ability of the BLM to undertake large-scale herbicide treatment projects that have minimal risk of harm to the environment while providing a significant and cost-effective benefit to wildlife. While herbicide use has risks and may impact some aquatic and terrestrial



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environments, we can't ignore the potential negative impacts to the environment that are likely to occur under alternatives to herbicide use – those being a reduction in acres treated and/or the large-scale use of mechanical treatments and fire. Either of those alternate treatments will impact fish and wildlife or their habitats (through collateral erosion, oil and other hazardous materials releases, disturbance or injury, etc.) versus the risk of impact posed by the use of herbicides.

Avoidance of Impacts to Riparian and Wetland Habitats

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While CalPIF does not support the adoption of Alternative E, we share some of the concerns over the widespread use of herbicides that Alternative E attempts to address. One component of Alternative E that we believe should be incorporated as part of Alternative B is the adoption of amphibian area avoidance measures. Under Alternative E, herbicide use is not encouraged in areas populated by amphibians. We believe that is a wise measure to adopt as part of any Alternative. There is concern today about significant declines in numbers of amphibians encountered on public lands and elsewhere. One of the potential causes for those declines is the chemicals that amphibians are exposed to. CalPIF believes the evidence that chemical exposure contributes to declines in amphibian populations is significant enough to justify avoiding the use of herbicides in and around riparian and wetland areas that support amphibians. Areas supporting amphibians are also important feeding and nesting areas for land birds that may also be vulnerable to herbicide exposure. Amphibians also represent a prey base that supports birds and other terrestrial species. For those reasons and others we think it a wise and modest measure to incorporate Alternative E's amphibian area avoidance measures into the final planning document.

At the same time, CalPIF is not espousing the elimination of herbicides in areas where amphibians may reside. Riparian areas are some of the most severely invaded habitats in the West. To completely exclude herbicides as a tool is not prudent when it can be shown for specific project areas that other tools are not practical, are likely to be unsuccessful, or may cause more damage to the habitat than can be justified. We recommend that the final planning document emphasize the avoidance of herbicide use in areas populated by amphibians. Manual or mechanical measures to remove invasive species should be given priority, and only when such measures are shown to be ineffective or not practical should herbicides be used in those areas – and then only by crews using a targeted approach. In that respect we agree with the emphasis in Alternative E that herbicide treatments must be of lower priority than non-chemical treatments ***in areas where the use of herbicide may impact riparian or wetland areas***. Under no circumstance should chemicals be applied aerially in areas known to be populated by amphibians. We recommend that the final planning document emphasize the use of non-aerial application techniques where there is a risk that herbicides will be applied to water, either directly or through drift.

Concerns over Specific Herbicides

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CalPIF is concerned that several of the active ingredients under Alternative B carry potentially moderate or high exposure risk to biota. Those active ingredients for which we



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are concerned include Bromacil, Diquat, Diuron, Fluridone, and Tebuthiuron. We recommend that in the final planning document it be stated that the risk of exposure to fish and wildlife will be considered when deciding what active ingredient(s) to use, and that all efforts will be made to select active ingredient(s) that pose the lowest risk of impacting fish and/or wildlife. Only when it can be shown that chemicals with lower risk are unlikely to be effective should chemicals with a higher risk of injury to fish and wildlife be chosen.

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In analyzing risks of exposure from the various active ingredients proposed for use under the Alternatives, the Biological Assessment lists a risk to large ungulates and others from long-term exposure when animals spend significant time foraging within a treated area. To minimize the opportunity for such risk, we recommend that large target areas be treated in a mosaic pattern, treating an area multiple times if necessary, to decrease the likelihood that animals will forage on treated vegetation for an extended period of time.

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The use of 2-4D is of concern for CalPIF, perhaps more so than with any other of the active ingredients listed for use under the Alternatives. 2-4D poses a high exposure risk for some categories of wildlife. We recommend that 2-4D not be applied aurally unless there is absolutely no other practical means for its application, and where the use of the other available active ingredients has little chance for success.

Post-Treatment Revegetation

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CalPIF supports another recommendation in Alternative E that we believe will be a critical component of success for the herbicide treatment program. In the overarching discussion covering all of the Alternatives, BLM has taken the position that it will only use native plants in its post-treatment vegetation work. CalPIF strongly supports that position. We urge BLM to resist using non-native plant species in post-treatment revegetation other than as an initial step in the long-term establishment of native vegetation. We support the following recommendations for the use of native plants put forth under the REVEGETATION section of Alternative E, and recommend they be incorporated as part of the final planning document:

- In revegetation efforts, whenever it is possible to do so, use native seed and seedlings that have been grown from seeds of locally adapted populations.
- If native seeds/plants are not available, revegetation projects will rarely be undertaken until native plant seed or plants become available. Non-native plant species will be used only in extremely degraded/severely altered systems as an intermediate step toward/placeholder for native restoration.
- When reseeding with non-native species, certification must be provided that only species that have been documented as non-persistent are present in the seeding mixture.



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Monitoring

9 We recommend the final planning document include a more extensive discussion of post-treatment monitoring. We did not find that extensive discussion anywhere in the Biological Assessment. If the Preferred Alternative is selected and the acres treated annually are to triple over the current condition, how will effective monitoring be accomplished? Will the annual budget for monitoring be tripled? It is critical to know what the effect of such an extensive annual herbicide treatment program will have on fish and wildlife, both as a result of direct application on populations and their habitats, and indirectly through habitat modification and temporary losses of habitat and forage. CalPIF recommends that, at a minimum, an avian monitoring program be developed and undertaken as an integral part of the herbicide treatment plan. We recommend avian monitoring because birds are often the easiest category of wildlife to monitor in that they are easily detectable and often show high site fidelity.

10 California Partners in Flight was established in 1992 in response to growing concerns about declines in populations of land bird species across the continent. The CalPIF initiative encourages conservation through partnerships before species and their habitats become threatened or endangered. CalPIF provides a constructive framework for guiding land bird conservation activities throughout the state. As a coalition and consensus of public and private agencies, CalPIF has put together seven habitat-based bird conservation plans (available at <http://www.prbo.org/calpif/>) to further its goals of helping bird species at risk and keeping common birds common.

Sincerely,

Kim Kreitinger
California Partners in Flight
Coordinator
kkreitinger@prbo.org
415-868-0655 x 320

Daniel Strait
California Partners in Flight
Agency Integration Committee Chair
Daniel_Strait@fws.gov
916-414-6456