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EMC0376
see FL0004

From: **Brett Richardson Bighorn County Weed and Pest, Greybull Wyoming**

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

1 Over the last 15 years of working in the invasive plant control and management field one of the biggest problems of working with bigger government agencies has been the writing of policies to fit their entire organization in the areas of plant management. The management decisions are often made with a variety of varying environmental, political, and economical factors needing to be addressed. To make smart and effective decisions the managers need to be flexible and utilize the best combination of control methods for each given problem. Alternative B would allow more of this needed flexibility than the other alternatives.

2 Proper use of the most effective herbicide for a specific vegetation treatment will result in decreased use of herbicides over the long term. Herbicides are rarely needed where limited or infrequent stress is put on an intact plant community. However, the introduction of invasive plants, a disrupted fire cycle, overgrazing and drought have resulted in fragmented desirable plant communities. To rehabilitate and increase total acres of resilient native plant communities, herbicide use must be an option for any integrated vegetation treatment program. A national policy that does not approve herbicide use, restricts use of ALS inhibitor herbicides or does not allow aerial application under any circumstance severely limits the ability to improve and rehabilitate infested land.

3 In addition, limiting or stopping use of herbicides on BLM lands will result in greater economic hardship for neighboring properties (federal, state and privately owned) as wildfires, invasive plants and erosion problems know no boundaries.

4 I strongly support 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.

Alternative B Expand Herbicide Use and Allow for Use of New Herbicides

5 Although greater acres will initially need to be treated under this alternative, the newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied in these acres for control of numerous weed species. The product imazapic will result in more resilient plant communities that will not require annual herbicide treatments. Addition of the two new aquatic products will allow rapid response to any aquatic weed

problems. Loss of old herbicide chemistry such as 2,4-DP, asulam, atrazine, fosamine, mefluidide and simazine is acceptable.

6 The other alternatives listed in the Draft BLM EIS do not provide adequate solutions to the ecological and economic threats caused by invasive plants. Therefore, I do not support them.

APPENDIX D PROTOCOL FOR IDENTIFYING EVALUATING, AND USING NEW HERBICIDES

Overall, I support this protocol. However, one change should be made to increase its effectiveness.

7 “*Determining the Need for New Herbicides*” requires an additional valid reason for considering approval of a new active ingredient along with “to expand availability of the number of substitute products to avoid resistance”. It is understood that this could be covered under “*but are not limited to:*”

NOT COVERED / ADDITION TO FINAL EIS NEEDED

8 PEIS is in need of a section addressing Early Detection and Rapid Response (EDRR). In Appendix D, the process to secure a new herbicide can take more than two years. This is unacceptable for problems that require EDRR. There MUST be an approved procedure for EDRR in regard to herbicide use.

9 The PEIS is also in need of a section addressing the development of sustainable fuel breaks in brush and grasslands in an effort to return wildfires to historical size and impact, as well as to protect private property, critical habitat areas and newly revegetated or rehabilitated sites. Suppression of fire should be a last resort; prevention through fuel breaks and proactive fuel management through vegetation treatments should be the first priority.