



# North American Weed Management Association

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From: **North American Weed Management Association Board of Directors**

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

1 The mission of the North American Weed Management Association (NAWMA) is to provide education, regulatory direction, professional improvement, and environmental awareness to preserve and protect our natural resources from the degrading impacts of exotic, invasive noxious weeds. Therefore, NAWMA supports responsible vegetation management through the use of an integrated approach that does not limit any of the management tools available.

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.

2 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 The BLM is responsible for over 260 million surface acres in the Western United States and only wish to treat 932,000 acres annually with herbicides, or less than one percent. Less than 1% a very small amount of land when consideration is given to the amount of acres that will inevitably be threatened by lack of herbicide use.

4 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.

5 Therefore, the NAWMA Board of Directors strongly support the approval and implementation of **Alternative B – Expand Herbicide Use and Allow for Use of New Herbicides**, as it makes available the most comprehensive set of tools to address the threat of invasive plants on BLM lands.

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