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From: Syngenta Crop Protection

EMC0526

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Re: Comments for Draft Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States.
Programmatic Environmental Impact Statement

1 Syngenta Crop Protection appreciates this opportunity to comment on the proposed “Draft Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS)”. As a world leader in the research and development of crop production technologies, and the manufacturer of a wide range of pesticides, we understand the importance of herbicides as a tool in successful integrated weed management (IWM) programs.

2 The successful IWM program utilizes the right tools at the right time, and it is as important to maintain valuable tools as it is to develop new methods of chemical, cultural, and mechanical control. In any given situation, one or more tools may be preferred over others but, in many cases, all of these tools will be utilized over time. The BLM professional must always assess the particular situation before choosing the tools for vegetation management.

3 The reasons for maintaining and expanding chemical options for BLM lands are obvious. Herbicides are the tool of choice 1) to reduce soil disturbance and subsequent erosion, 2) to reduce disturbance of desirable vegetation, 3) to reduce gasoline costs, 4) to prevent the destruction of wildlife habitat and their food sources caused by mowing, 5) to kill the roots of undesirable perennials, and 6) to reduce the chance of wildfires. Endangered species and their habitat can be protected, at the same time that invasive, noxious, and other undesirable plants are managed or controlled with herbicides. Low volume application techniques make herbicides an economical choice, and use of herbicides reduces accidents caused by mowing equipment and chain-saws.

4 The herbicides of choice in BLM lands, now and in the future, are those which control undesirable vegetation, protect and promote desirable organisms, and degrade rapidly in the environment. In addition, the BLM professional can select formulations and utilize application techniques that are most suited to the particular situation – the target weeds, the beneficial plants and animals, the soil, weather, topography, and location of sensitive areas. Use of the appropriate herbicides in a responsible way enhances the health and competitiveness of the desired vegetation, making intervention – whether chemical, cultural, or mechanical – less necessary in the future.

5

The environments that BLM professionals manage are diverse. In forests, for example, there may be a need to prevent weed establishment, prepare a site for seedling establishment, help trees compete during the early years of growth, manage understory release, improve accessibility during harvest, shorten the time to maturity, and/or convert an unproductive or unaccessible site into a valuable resource to society. To attain success in meeting these diverse needs in a sustainable manner, the BLM professional needs a variety of options, now and in the future.

6

Syngenta **strongly supports Alternative B**, which would allow for the expansion of herbicide use and the introduction of new herbicides in the 17 western states. This alternative would empower BLM managers to explore new chemical control methods which provide the same benefits (described above) as currently approved products while, in many cases, also providing the added benefit of reduced risk for users and the environment. Maintaining only the currently approved herbicides (Alternative A) does not recognize that more choices will reduce the development of resistant weeds, while allowing further improvements in chemical control to be accessible to BLM professionals. Eliminating herbicide use (Alternative C) would make the benefits of herbicides unavailable to the BLM professional, severely limiting IWM options for use in the management of BLM administered land and hence negatively impact the conservation of this natural resource for the future.

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Syngenta respectfully submits these comments and welcomes any questions.

Sincerely,

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