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February 10, 2006

Brian Amme, Project Manager
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520

EMC0647

Re: Comments on the Draft Programmatic Vegetation Treatments EIS
Transmitted by FAX and Email

Dear Mr. Amme:

1 Alaska Community Action on Toxics is a statewide non-profit public interest environmental health research and advocacy organization dedicated to protecting environmental health and achieving environmental justice. Alaska Community Action on Toxics mission: *to assure justice by advocating for environmental and community health. We believe that everyone has a right to clean air, clean water and toxic-free food.* We work to stop the production, proliferation, and release of toxic chemicals that may harm human health or the environment. I am preparing these comments on behalf of our statewide membership. My name is Pamela K. Miller, Executive Director and a biologist representing Alaska Community Action on Toxics. Please assure that these comments are entered into the official public record. We would appreciate your careful consideration.

2 Alaska Community Action on Toxics asserts that the BLM must adopt Alternative C—No Use of Herbicides. People in Alaska have been overwhelmingly opposed to the use of herbicides in vegetation management for forestry, transportation rights-of-way, and for invasive species. In Alaska, more than in any other place in the country, people rely on the safe harvest of traditional subsistence foods and medicinal plants, including mushrooms, greens, berries, roots, fish, caribou, moose, waterfowl and terrestrial birds, and other wildlife. Subsistence foods comprise a significant, and in some communities, almost the entire diets of many Alaska Native and rural non-Native people. Thus, people are at much greater risk of exposure in areas treated with herbicides and it is especially important to use non-chemical alternatives rather than herbicides. People also rely on surface waters and individual wells to a great extent in rural Alaska. Commercial fisheries and the livelihood of fishing families are also dependent on good water quality and fish habitat—herbicide use would pose a serious hazard to the health of the

commercial fisheries, the marketing and economic viability of our commercial fisheries. These factors are not thoroughly assessed in the human health risk assessment.

3 In a systematic review of the peer-reviewed scientific literature concerning health effects of pesticides, a team of physicians from the Ontario College of Family Physicians concluded: “The literature does not support the concept that some pesticides [including herbicides] are safer than others; it simply points to different health effects with different latency periods for the different classes...Some more surprising positive associations were found for pesticides that are considered less toxic in acute poisoning settings...[For example] the herbicides glyphosate and glufosinate had associations with congenital malformations. Parental preconception exposure to glyphosate was associated with late abortion.” Although glyphosate is touted as a “safe” herbicide, the latest science demonstrates that it is associated with serious adverse environmental and health effects.

4 The BLM must implement vegetation management strategies with the following guidelines:

- Least disruptive of natural controls.
- Least hazardous to human health.
- Minimize negative impacts to non-target organisms, including other plants, insects, aquatic invertebrates, fish, and wildlife.
- Least damaging to ecological systems, including water quality, nutrient cycling, soil microbes, mycorrhizae, plant-animal interdependencies.
- Most likely to produce long-term solutions in vegetation control requirements.

5 The vegetation management program must provide regular monitoring to determine if and when treatments are needed. Educational, physical, mechanical, and biological measures of prevention and control will be given priority over chemical measures. Herbicides will be used only as a last resort. If herbicides are used, the BLM will use the smallest amount of the least toxic formulation with the least potential for contamination of subsistence resources, wildlife, or human exposure. Further, no chemical is permitted for use if it is acutely toxic or proven to cause cancer, hormone disruption, reproductive damage, immune system damage or nervous system toxicity. The BLM will apply the precautionary approach in all pest management decisions to prevent harm to human health and the environment from the use of toxic pesticides that have not been fully tested. The public process should be open and inclusive if herbicides are being considered in a particular area. If herbicides are used as a last resort, people that may use the area should be properly notified well in advance with publication in local newspapers and signage around the perimeter. Signage should be posted at least 72 hours in advance and left up at least 72 hours following herbicide applications. The notification and signage should include information about the environmental and health effects of the herbicides.

6 BLM does not provide justification for its “approved” list of herbicides. It is wrong to state that “Except for diquat, new herbicides proposed for use pose few or no risks to workers or the public.” Herbicides are inherently harmful and should be replaced with safe non-chemical alternatives. We are particularly concerned that BLM is proposing to

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add diquat to its list of “approved” herbicides. The following acute (short-term) health effects may occur immediately or shortly after exposure to diquat:

- irritation of the eyes, nose, and throat and may cause nosebleeds
- nausea, vomiting, diarrhea, tremors, convulsions, and even death
- reproductive toxicity that may decrease fertility in males.
- repeated exposure may cause clouding of the eye lenses (cataracts) and damage skin
- damage to the liver, kidneys and lungs.

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Since diquat is a nonselective herbicide, it may present a danger to non-target plant species. Cows are particularly sensitive to the toxic effects of this material.¹

Again, we strongly urge BLM to replace the use of herbicides with effective mechanical and biological controls. Thank you for your consideration of our comments.

Sincerely,

Pamela K. Miller
Executive Director

¹Sanborn, M. et.al. 2004. Systematic Review of Pesticide Human Health Effects. Publication of the Ontario College of Family Physicians. P. 164.

¹ <http://extoxnet.orst.edu/pips/diquatdi.htm>