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From: William A. Kolbe, BCE Market Development Specialist BASF The Chemical Company

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

1 I have been in the Pest Control Industry for over 30 years and am very versed on insect pests, turf pests as well as weed management where plant species are found in areas where they cause significant adverse effect on native grasses and plants. Invasive plants as well as those that displace natural plants will continue to be major issues in forests, along roadways, highways, rights of ways, golf courses, and lawns in the world. One small example is that the US and the rest of the world desperately needs herbicides to keep the yield of saplings in forest farms at it's highest. Future wood demands will be astronomical due to wood demands brought on by natural disasters such as hurricane Katrina and currently floods in California and fires in Oklahoma. The loss of herbicides would actually create a significant increase in costs of wood products because without herbicides wood and tree production would suffer extensively due to weed competition in timber growth forests.

2 Proper use of the most effective herbicide for a specific vegetation treatment will result in overall decreased use of herbicides. Herbicides are rarely needed in a healthy environment where limited or infrequent stress is put on an intact plant community. However, the introduction of invasive plants, too frequent fire, over grazing, and drought have resulted in fragmented desirable plant communities threatened by invasive plant dominated adjacent communities. To rehabilitate and increase acres of plant communities that are resilient to invasive plants, herbicides must be an option for any integrated vegetation treatment program. A national policy that does not approve herbicide use or restricts use of ALS inhibitor herbicides or does not allow aerial application under any circumstance will NOT result in improvement or rehabilitation of infested land. Consequently, limiting or stopping use of herbicides on BLM will result in greater economic hardship for neighboring properties (federal, state and private) as wildfires, invasive plants and erosion problems know no boundaries.

Alternative A No Action Alternative

3 The continuous degradation of BLM land is evidence that *Alternative A* does not provide the tools needed for Hazardous fuel reduction programs, Emergency Stabilization or Rangeland Rehabilitation. BLM lands will continue to degrade at an accelerated rate if vegetation treatment continues under alternative A.
I do not support Alternative A.

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

4 Although greater acres are initially treated under this alternative, the newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied for control of numerous weed species. The product imazapic will result in more resilient plant communities not in need of 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, melfluidide and simazine is acceptable.
I strongly support the approval of Alternative B.

Alternative C No Use of Herbicides

5 It has been proven in operational control programs and numerous research studies for numerous weeds (deep rooted perennial weeds, large scale infestation of annual weeds), that control efforts minus herbicides are ineffective. Without the use of herbicides, BLM land will eventually become a biological desert, unable to even support livestock. This alternative puts all adjacent lands in great risk, including our National Parks, State lands, private property and Forest Service resources.
I do not support Alternative C.

Alternative D No Aerial Applications

6 With today's technology for improved aerial spray techniques (including booms, nozzles, GIS capability), aerial application of herbicides is more targeted, more efficient, creates less impacts/disturbance/drift, and can be more effective than ground applications. "Greater Drift" impact is minimized by use of selective herbicides and new application technology.

7 Not all BLM land in need of a vegetation treatment has terrain conducive to ground application. Use of manual or ground application equipment to spray rough terrain can result in herbicide overlap and skips, resulting in either damage to desired vegetation or leaving invasive plants to re-populate the area. Some critical habitat areas are only accessible for vegetation treatment by air. Some invasive plants, such as large stands of saltcedar and Russian olive, are best treated by air when considering an economical and effective treatment. The EIS correctly outlines how aerial application is more cost effective than ground application.

8 Specifically written bid specifications can help to avoid off target damage, by assuring best aerial application technology and applicators with reputations for accurate applications.

Alternative E No Use of Acetolactate Synthase-inhibiting Herbicides
Emphasis on passive restoration:

9 It is good practice to base vegetation management decisions on priorities, goals, scientifically proven methods and put emphasis on prevention. However, this section puts the greatest restrictions on BLM for vegetation management restorative processes. The actions called for will delay treatment due to lack of

10 time, materials, personnel and funding. In addition, the section has many points of contradiction in relation to use of ALS herbicides, restoration with native vegetation, using best available science and using limited disturbance management practices. This alternative has several facts wrong and misses the mark on

11 altering fire behavior. The section of greatest concern is banning use of ALS herbicides..
I strongly appose Alternative E (Management outlined in Appendix G)

12 **APPENDIX D PROTOCOL FOR IDENTIFYING EVALUATING, AND USING NEW HERBICIDES**

Overall I support this process with one change needed.
"*Determining the Need for New Herbicides*" requires an additional valid reason for considering approval of a new active ingredient of "to expand availability of the number of substitute products to avoid resistance". It is understood this could be covered under "*but are not limited to:*"

13 **NOT COVERED / ADDITION TO FINAL EIS NEEDED**

PEIS is in need of a section addressing Early Detection Rapid Response (EDRR). In Appendix D the process to secure a new herbicide is 2+ years. This is unacceptable for EDRR. There MUST be an approved procedure for EDRR in regard to herbicide use.

14 PEIS is in need of a section addressing development of sustainable fuel breaks in the brush/grasslands in an effort to return wildfires to historical size as well as protect property, critical habitat areas and newly revegetated or rehabilitated sites. Suppression should be a last resort, prevention as fuel breaks and pro-active fuel management as vegetation treatments should be a first priority.

Sincerely,

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