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From: Roger Banner; Associate Professor and Extension Rangeland Specialist
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Subject: COMMENTS for Draft Vegetation Treatments Using Herbicides on BLM lands in 17
Western States. Programmatic Environmental Impact Statement

Personal Experience and Comments

I have worked in the rangeland management arena for 36 years. I have been a university extension specialist and faculty member for much of that time. There are many complex ecological and environmental issues and problems that land managers must address. Invasive plant species represent one of the most serious threats to rangeland ecosystems that we face. Because we are dealing with organisms that are relatively new to the ecosystems in question, landscape level type conversions are not only probable, but are unavoidable, if invasive species are not aggressively addressed. Long-term results will be conversion to entirely new and different systems from the native systems we are familiar with. BLM managers need to have all of the effective tools available to them in order to meet this challenge. Dealing with new species is an entirely different issue than managing native plant communities. The implications of not allowing the use of the best tools we have are very large from an ecological, environmental, economic and social perspectives.

The introduction of invasive plants, too frequent fire, physical disturbance, and drought have resulted in fragmented desirable plant communities threatened by invasive plant species. 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. In fact, it will be a major contributing factor to loss of native plant communities and, because habitat for other organisms is influenced by the plant communities, many entire ecosystems. 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

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*. Things will not “go back to the way they were” if we just leave everything alone.

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

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, mefluidide and simazine is acceptable.

I strongly support the approval of Alternative B. BLM managers need this alternative in order to address vegetation management issues.

Alternative C - No Use of Herbicides

It has been shown 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 support livestock or native wildlife. This alternative is unrealistic and puts all adjacent lands in great risk, including our National Parks, State lands, private property and Forest Service resources.

I strongly oppose Alternative C. I think it supports a very naïve natural resource management point of view, is short-sighted and would have very serious and environmentally detrimental unintended consequences for forest and rangeland ecosystems and landscapes.

Alternative D - No Aerial Applications

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.

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

I strongly oppose Alternative D. We are not dealing with vacant lots in town. There is a great deal technology that provides accurate, selective aerial application of materials, whether it is herbicide on forest and rangelands, or fertilizer, seed, or other substances in cropland agriculture.

Alternative E - No Use of Acetolactate Synthase-inhibiting Herbicides

Emphasis on passive restoration:

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 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 altering fire behavior. The section of greatest concern is banning use of ALS herbicides.

I strongly oppose Alternative E (Management outlined in Appendix G)

APPENDIX D - PROTOCOL FOR IDENTIFYING EVALUATING, AND USING NEW HERBICIDES

Overall I support this process but one change is 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:*"

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.

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, such as fuel breaks and pro-active fuel management through vegetation treatments, should be a first priority.