



Friends of the Inyo

275 South Main Street, Suite C Bishop, California 93514

(760) 873-6500 www.friendsoftheinyo.org

ADVOCACY

EDUCATION

STEWARDSHIP

7 January 2005

Brian Amme
Vegetation EIS Project Manager, BLM
P.O. Box 12000
Reno, NV 89520-0006
vegeis@nv.blm.gov.

EMC0220

RE: Opposition to Alternative B, conditional support for a modified alternative combining Alternatives D & E with a prohibition on large-scale use in NLCS units.

Dear Mr. Amme,

1 Thank you for this opportunity to comment on the BLM's current Programmatic Vegetation Environmental Impact Statement.

2 Friends of the Inyo is a locally-based, public-benefit conservation organization dedicated to the preservation of the public lands and wildlife in the Eastern Sierra (Inyo and Mono Counties of California).

3 We wish to express our strong opposition to the BLM's current preferred Alternative B – Expanded Use of Herbicides in 17 Western States.

4 We believe a combination of Alternatives D - No Aerial Application and E - No Use of Acetolactate Synthase-inhibiting Herbicides modified to preclude large-scale (larger than 1 ac) application in NLCS units to be a legally and morally acceptable alternative.

5 We are especially concerned about and strongly opposed to any use of aerial application and increased application within units of the National Landscape Conservation System, most notably designated Wilderness Study Areas. As the BLM is aware, “preservation of wilderness values within a WSA is paramount and should be the primary consideration when evaluating any proposed action or use that may conflict with or be adverse to those wilderness values. The concept of considering wilderness values first asserts, with few exceptions (e.g., valid existing rights, grandfathered rights, etc.), that wilderness resource management objectives within a WSA should take precedence over all other resource management program objectives” (WSA Interim Management

5 con't

Policy H-8550-1). Large-scale application of herbicide to “manage” vegetation within a WSA seem wholly counter to the BLM’s legal requirements to manage

6

It is our understanding that under this current PEIS, site-specific analysis at the Field Office level will still be required until any on-the-ground activity takes places. We encourage the BLM to conduct aggressive outreach to communities potentially affected by any application of synthetic herbicide. Pets, children, livestock, endangered species, and non-target species will suffer unless the owners of public lands – especially those who inhabit the rural West – know what is being planned for their backyard. The negative impacts on local organic, conventional and subsistence agricultural must also be locally discussed, studied and disclosed.

7

The PEIS states that “treatments would benefit local communities by providing jobs and income.” We must ask, how much greater would these potential benefits be if the “vegetation management” goals proposed to be achieved through the use of synthetic herbicides were achieved through other means, such as the use of specialized livestock and grazing rotations to reduce exotic grasses, the employment of large restoration crews to physically remove exotic species such as tamarisk, and the reduction of fire danger by manually creating strategic fire breaks around communities with hand crews rather than killing large swaths of vegetation with herbicides in the back of beyond?

8

The BLM must abandon its tired practice of justifying unsustainable land management strategies with meager, short-term local economic gains. Large-scale herbicide application benefits the economies of large chemical corporations more than a few short term and toxic application jobs. Employing able-bodied Americans to actively restore and steward their public lands would create more jobs than any herbicide project. It goes without saying that those “local benefits” may be outweighed by a future of unknown consequences.

9

Thank you again for this opportunity to comment on this important project. The effects of the actions proposed in this PEIS may have massive ramifications for generations to come. The worst part is, we don’t even know what those ramifications may be for the future health of wildlife, native flora and the people of the 17 Western States.

Respectfully,

Paul McFarland
Executive Director