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From: Dr. Nelroy E. Jackson
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Date: February 10, 2006

Duplicate of EMC636

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

I am pleased to have this opportunity to comment on the proposed Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States. I have spent much of my career developing herbicides for use in the management of weeds in agricultural, aquatic, forest, horticultural, amenity, range, right-of-way, and natural area environments.

Herbicides can play a major role in the development and management of fuel breaks in brush, chaparral and forests, with the ultimate aim of creating mosaics of different age classes of vegetation and reducing the destruction caused by uncontrolled wildfires. It is imperative for a viable future of our rangelands and forests that all tools of weed control – mechanical, biological and chemical - are available to the stewards of lands. The stakes are too high to tie the hands of our land managers to the extent that they will ultimately fail to preserve and protect our natural resources.

The selection of the most appropriate control methods is influenced by land management objectives; effectiveness of the control technique on the target species; environmental factors; land use; economics; and the size of weed infestations. An integrated weed management (IWM) approach that gives consideration of all management tools, including herbicides, is critical for managing extensive weed infestations. This was highlighted when the Invasive Species Advisory Committee (ISAC) recommend a set of Control and Management Guidelines for invasive species to the National Invasive Species Council (NISC). The guidelines were accepted and adopted by NISC.

Thus, I **strongly support Alternative B**, expand herbicide use and allow for use of new herbicides in 17 western states. Herbicides must remain a management tool for invasive weeds. I support the continued responsible use of established reliable herbicides like glyphosate, triclopyr, imazapyr and metsulfuron methyl as well as the addition of newer, scientifically advanced chemistries, such as imazapic, diflufenzopyr, and fluridone that have been developed during the last 13 years. Proper use of the most effective herbicide for a specific vegetation treatment will enhance our environment.

I strongly oppose all other alternatives:

- Alternative A: No change from current EIS
- Alternative C: No use of herbicides
- Alternative D: Alternative B without aerial application of herbicides
- Alternative E: No use of present or future AHAS inhibitor herbicide

A national policy that does not approve herbicide use 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 lands will result in greater economic hardship for neighboring properties (federal, state and private) since wildfires, invasive plants and erosion problems have no boundaries.

Herbicides can benefit the recovery of threatened and endangered (T&E) species by controlling noxious and invasive weeds that otherwise adversely alter habitats making them less suitable for T&E organisms. There are herbicides which are applied selectively and will control noxious or invasive plants without harming T&E species. There is an excellent example where control of *Arundo donax* in the Santa Ana river basin in southern California by the combination of chemical and mechanical control has led to the recovery of least Bell's vireo, a small songbird on the T&E list.

Should the Bureau have any questions about these comments, please feel free to contact me.

Sincerely,

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Consultant, Vegetation Management