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EMC0331

From: Weed Science Society of America (WSSA)
Attn: Lee Van Wychen, Ph.D.
Director of Science Policy

Date: January 9, 2006

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

1 The Weed Science Society of America (WSSA) is pleased to have this opportunity to comment on the proposed Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States. The WSSA is a non-profit association of academic research, extension, government, and industrial scientists committed to improving the knowledge and management of weeds in agricultural, aquatic, forest, horticultural, amenity, range, right-of-way, and natural area environments. The WSSA and its affiliates, the Aquatic Plant Management Society, the Northeast Weed Science Society, the North Central Weed Science Society, the Southern Weed Science Society, and the Western Society of Weed Science represent over 4000 members nationwide.

2 The WSSA is very concerned about the impact of invasive weeds on the continent's natural areas. The spread of noxious weeds has been considered by the US Department of the Interior to be analogous with a biological wildfire. As with wildfire management, a variety of treatments or techniques must be available for management of weeds. These include prevention, early detection, timely control (biological, physical, chemical, or cultural), and site rehabilitation. 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 equal consideration of all management tools, including herbicides, is critical for managing extensive weed infestations.

3 Thus, the **WSSA strongly supports 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. The WSSA supports the continued responsible use of established reliable herbicides like 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 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.

The WSSA strongly oppose all other alternatives:

- 4 • 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

5 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 have no boundaries.

6 The **WSSA also supports the developed Appendix D**, “Protocol for Identifying, Evaluating and Using New Herbicides” to facilitate evaluation and addition of new chemicals as they become available in the future. However, 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:”

7 Finally, WSSA supports two additional sections not currently covered in the Programmatic Environmental Impact Statement (PEIS). The WSSA strongly encourages the BLM to add section that addresses an Early Detection Rapid Response (EDRR) protocol for invasive weeds. 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. The WSSA also supports a section that addresses 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 and prevention as fuel breaks and pro-active fuel management as vegetation treatments should be a first priority.

8 Given the depth of expertise available with the WSSA, we believe we can help the Bureau with all manner of questions relative to assessment of new herbicides. This expertise includes understanding the scope of data included in the registration packages submitted to EPA, herbicide modes of action, environmental mobility, non-target risks, use limitations, potential persistence and selectivity, and comparative efficacy. Given this expertise we would like to participate in any efforts to develop such a protocol for evaluating newly registered herbicides during the term of the PEIS.

9 The WSSA is thankful to the BLM for this opportunity to comment on the proposed Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States. We have identified some issues that our important to our members as well as several areas

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where we hope we can be of assistance in this important process. Should the Bureau have any questions about these comments, please feel free to contact me.

Sincerely,

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