

SAN MIGUEL COUNTY

BOARD OF COMMISSIONERS

VERN EBERT

ELAINE FISCHER

ART GOODTIMES

January 4, 2006

Brian Amme, Vegetation EIS Project Manager
Bureau of Land Management
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

- 1 We would like to submit comments on the *Draft BLM Vegetation Treatments Using Herbicides Programmatic EIS*. San Miguel County and our county weed program have a long standing relationship with the Bureau of Land Management offices that control lands within our county. We have worked together on many projects and believe that we understand the unique issues associated with control of noxious weeds on public lands in our area.
- 2 We support alternative B and feel that the other alternatives, with their limitation of options, are inappropriate and will lead to further degradation of our public lands through the spread of invasive plants and the associated damage to native and desirable plant populations and the many species dependent on them.
- 3 Herbicides are toxic chemicals and must be used properly by well trained applicators. We believe that such use, when in full compliance with the label, can be an effective weed control measures. We suggest that the BLM use professional applicators certified by applicable state or federal agencies for herbicide applications and that BLM personnel be assigned primary duties in weed management rather than weed management as an ancillary duty. Public health concerns and potential for environmental damage must be mitigated through planning, appropriate choice of herbicides and proper application by well trained applicators.
- 4 Alternative A would have BLM weed control efforts remaining static and in our opinion, inadequate. This is shortsighted and inappropriate as the problem will continue to grow and must be dealt with appropriately. BLM should expand integrated weed management treatments if we are to slow the rapid spread of noxious weeds on the 262 million acres BLM controls.
- 5 We support Alternative B, although we feel great caution should be exercised in expanding herbicide use and increasing acres of control. We are particularly concerned about the use of new herbicides. We feel that new technology needs a thorough vetting before its use on public lands. We have seen a number of herbicides withdrawn from use after we've become more familiar with their at-first-unrecognized toxicity.

6 Alternative C does not allow for the use of herbicides. This would not allow managers full use of all available tools for the control of noxious weeds- limiting control efforts to biological, cultural and mechanical controls would result in vast increases in noxious weeds and is an inappropriate alternative. In many situations there are no viable, effective alternatives to the use of herbicides- as much as we all wish there were.

7 Alternative D bans aerial application of herbicides but is otherwise the same as alternative B- the preferred alternative- including access to new ingredients. Aerial application may be appropriate for remote and isolated locations- particularly in areas where vehicle access is impossible or difficult. Aerial application could reduce the impact of foot and equipment traffic, protecting soil crusts from deterioration while stopping the spread of noxious weeds into new areas. While it is also a cost effective and efficient alternative to ground application on large areas, potential problems such as off-target damage and risks to human health, make it an alternative that should only be used under the most stringent conditions and scrutiny. While we are supporting Alternative B, and do not want to ban all aerial applications, we also recognize that they are problematic and must not be used indiscriminately.

8 Alternative E disallows the use of sulfonylurea herbicides including imazapic- again removing an effective tool from the arsenal that has not demonstrated significant toxicity to warrant its exclusion at this time.

9 Thank you for considering our comments. Please do not hesitate to contact us if any further comment or assistance is desired.

Sincerely,



Elaine R.C. Fischer, Chair

Cc: Sheila Grother, San Miguel County Weed Program , Director