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Telephone: 208-736-3600

FAX: 208-736-0843



University of Idaho

Department of Range Resources

Twin Falls Office

P.O. Box 1827

315 Falls Avenue

Twin Falls, Idaho 83303-1827

January 10, 2006

Bureau of Land Management
Nevada State Office
Attn: Brian Amme, EIS Project Manager
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

1 I have reviewed and would like to offer the following comments on the Draft Vegetation Treatment Using Herbicides Programatic EIS. I found the EIS to be a thorough analysis of the problem, the need for herbicides in an integrated vegetation management program and the potential impacts to both public rangelands and society under the various alternatives.

2 I support the preferred Alternative B -- Expand herbicide use and allow for use of new herbicides in the 17 western States. I strongly object to Alternatives C, D and E. Without the use of herbicides or aerial application, along with other vegetation control methods, public rangelands will continue to be invaded by noxious weeds and other undesirable vegetation such as annual grasses and invasive shrubs. These undesirable plants will greatly decrease the value of infested rangelands for all uses, including recreation, and wildfire will become an even greater danger to western communities. 3 I do wish that atrazine had remained on the list of approved herbicides, as research many years ago had shown it to be a promising tool for controlling annual grasses.

4 As new herbicides become available they should be evaluated for use on public rangelands. The evaluation should be based on sound scientific research, not pseudo-science as was the case with the irresponsible use of sulfometuron methyl for cheatgrass control on thousands of acres of rangeland. However, acetolactate syntase-inhibiting herbicides should not be banned from use because of that case of misuse.

5 I highly recommend the Bureau of Land Management approve the draft EIS and continue to use herbicides for vegetation control on public rangelands. Losing herbicides as a tool to control undesirable vegetation poses a far greater threat to the environment, safety and economic viability of the western U.S. than any of the approved herbicides under Alternative B would pose.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth D. Sanders".

Kenneth D. Sanders, Professor