January 10, 2006

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

RE: Comments to the Programmatic EIS (Draft) for Vegetation Treatments Using Herbicides on BLM lands in 17 Western States

1 Thank you for extending the opportunity to comment on such a large scale Draft EIS. We feel that the importance of this EIS was not communicated very well to the general public. This subject did not make much of an impression on the radar screen.

First, we would like to state that we strongly support Alternative B- Expand Herbicide Use and Allow for the Use of New Herbicides. We work very closely with the county's noxious weed control agents and realize the frustration in trying to control the expansion and introduction of noxious weeds. The current funding levels barely achieve adequate noxious weed management levels. Having increased options and tools will help to offset diminishing funding. Greater acres are initially treated under this Alternative, but with newly available herbicides, less active ingredients need to be applied for control. Proper use of most herbicides for a specific vegetation treatment will also result in an overall
2 decreased use of herbicides. With the currently fragmented desirable plant communities, invasive plant species can easily dominate these communities. To rehabilitate and increase the area of existing desirable plant communities, herbicides must be an option in any integrated vegetation treatment program. Limiting or stopping the use of herbicides on BLM administered lands will result in greater economic hardship. This hardship will greatly impact neighboring lands such as federal, state, and private. Such lands are generally obligated by various laws to control the spread of noxious weeds. Undesirable plant species do not recognize ownership boundaries. We again ask you to approve the implementation of Alternative B.

3 The choice of Alternative A – No Action- is not appropriate. The current management situation does not provide adequate control. Degradation will continue at an accelerated rate. We do not support this alternative.

At this point in time, Alternative C is not even logical. Without the proper use of herbicides, BLM administered lands will become a biological desert. This alternative also puts all adjacent lands: national parks, state lands, private property, and Forest Service administered lands in great risk. All land owners / managers need to be "on the same page" on invasive vegetation management to achieve a reasonable level of control. We cannot support Alternative C.

4

We oppose the implementation of Alternative D- No aerial Applications. Today's technology has improved aerial spray techniques. New herbicides greatly reduce "drift." Aerial applications are more targeted, are more efficient, create less impact, less disturbance, and can be more effective than ground applications. Not all BLM lands are conducive to ground application. Some of the taller invasive species dictate the use of aerial application. The EIS correctly outlines how aerial application is more cost-effective than ground application. Specifically written bid specifications can help avoid off-target damage by assuring the best aerial application technology for greater accuracy.

5

Alternative E puts the greatest restrictions on the BLM for vegetation management restorative processes. We could not support this alternative. The actions called for will delay treatment due to lack of time, materials, personnel, and funding. The section of greatest concern is the banning of ALS herbicides.

6

A couple of additions should be incorporated into the final EIS. The first is to increase the response to a determined need. In Appendix D, the process to secure a new herbicide is 2+ years. There needs to be in place an expedited procedure to approve an herbicide for use. The second addition would be to place a greater emphasis on the development of sustainable fuel breaks. This would help to return wildfires to historical size, protect property, critical habitat areas, and newly rehabilitated sites.

7

Again, thank you for the opportunity to address this issue. The implementation of an undesirable alternative would have a great impact upon the composition of not only BLM lands, but also a great negative impact on non-BLM lands. Please implement the realistic choice- Alternative B.

8

Sincerely,

Michael Poulton

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