Pitkin County Public Works

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

Dear Mr. Amme;

1 The Pitkin County Weed Advisory Board would like to submit the following comments on the *Draft BLM Vegetation Treatments Using Herbicides Programmatic EIS.* The Pitkin County vegetation management program has historically endorsed an integrated weed management program with the philosophy that the proper use of the most effective herbicide for a specific vegetation treatment will result in decreased use of herbicides over a long term.

2 Herbicides are rarely needed where limited or infrequent stress is put on an intact plant community. However, the introduction of invasive plants, a disrupted fire cycle, overgrazing and drought have resulted in fragmented plant communities. To rehabilitate and increase total acres of resilient native plant communities, herbicide use must be an option for any integrated vegetation manager. The responsible use of established reliable herbicides like imazapyr and metsulfuron methyl and the addition of newer, scientifically advanced chemistries, such as imazapic, diflufenzopyr and fluridone can significantly advance all of our land management programs. A national policy that does not approve herbicide use restricts use of ALS inhibitor herbicides or does not allow aerial application under any circumstance severely limits the ability to improve and rehabilitate infested lands. In addition, limiting or stopping use of herbicides on BLM lands will result in greater economic hardship for neighboring properties (federal, state and privately owned) as wildfires, invasive plants and erosion problems will continue to expand.

3 The Pitkin County Weed Advisory Board fully supports alternative B, although we feel great caution should be exercised in expanding herbicide use and increasing the number of acres to control. We feel other alternatives would hold back weed control progress on the 262 million acres the BLM controls.

4 Alternative A would have BLM weed control efforts remaining motionless and in our opinion, inadequate. This is short sighted and inappropriate as the problem will continue to grow.

5 Alternative D bans aerial application of herbicides but is otherwise the same as Alternative B -- the preferred alternative -- including access to new ingredients. Aerial applications may be appropriate for remote and isolated locations- particularly in areas where vehicle access is impossible.

6 Alternative E will not allow 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.

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

Sincerely,

Jim Lewis,
Liaison for the Weed Advisory Board