



DEPARTMENT OF THE NAVY

NAVAL AIR STATION FALLON
4755 PASTURE ROAD
FALLON, NEVADA 89496-5000

5090
Ser N45FCW/002
4 Jan 06

Bureau of Land Management
Attn: Brian Amme, Vegetation EIS Project Manager
PO Box 12000
Reno, NV 89520-0006

- 1 The Environmental Department staff at Naval Air Station Fallon, Nevada has reviewed your Draft Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic EIS and has the following comments:
- 2 Naval Air Station (NAS) Fallon administers approximately 240,000 acres of withdrawn and acquired land in Churchill County, Nevada. NAS Fallon is the premier tactical air training facility and consists of 6 training ranges and a large airfield. The BLM Carson City Field Office manages the land surrounding the NAS Fallon training areas as well as withdrawn ranges per the Military Land Withdrawal Act of 1999. On some areas of the Navy's Training Ranges there are invasive species growing and spreading. Some of the invasive species observed on these lands are Salt Cedar, Russian knapweed, Russian thistle, Cheatgrass, and Whitetop. Weeds such as Cheatgrass have spread throughout the rangeland and increased the risk of catastrophic wildfires. The Navy and BLM jointly implement Integrated Pest Management to control the invasive plant species and assistance from BLM, which manages lands adjacent to the Navy lands, is required. Integrated Pest Management includes a variety of treatment methods such as: prescribed fire, manual and mechanical methods, biological controls, and herbicide treatments. Some of the invasive plants growing on BLM lands surrounding the Navy's training areas will only be successfully controlled with herbicide treatments.
- 3 NAS Fallon supports the Preferred Alternative in this EIS to expand the herbicide use and allow for use of new herbicides in 17 western states including Nevada. Under this alternative approximately 932,000 acres would be treated annually using herbicides. In Alternative A, the No Action alternative, only 305,000 acres are proposed to be treated with herbicides. Table 2-6 in the EIS lists the standard operating procedures that would be followed by BLM to ensure that risks to human health and the environment from herbicide treatment are kept to a minimum. The majority of the treatments would occur in Nevada, Idaho, Oregon, and Wyoming. The herbicides that are proposed to be used are registered by the U.S. Environmental Protection

Agency (EPA) and approved for use on one or more of the land types managed by the BLM. The BLM will consult with the EPA, US Fish and Wildlife Service, and National Oceanic and Atmospheric Administration Fisheries to develop an ecological risk assessment for new herbicides that may become available in the future.

4 Prevention, early detection, and rapid response are the most cost effective methods for weed control. If herbicide use is limited, BLM lands will continue to degrade and the weeds will spread to adjacent lands owned or administered by others. The Navy has spent several thousands of dollars on invasive species control and revegetation projects at NAS Fallon. To successfully control the invasive plant species on the Navy lands in Nevada, the Navy needs assistance from the BLM, which is the largest land manager in Nevada.

5 Thank you for the opportunity to provide comments on this document. If you have any questions please call Mr. Gary Cottle, Navy Natural Resources Management Specialist at (775) 426-2956.

Sincerely,



RAJAGOPAL KRISHNAMOORTHY
Supervisory Environmental Engineer
By Direction of
The Commanding Officer

Copy to: Raj Krishnamoorthy, NAS Fallon