

BLM Vegetation Management Programmatic EIS Comments

1. Lack of integration with timber management plan

As timber management is the dominant activity that the BLM oversees, timber management practices, which by their very nature spread invasive weed seeds, must be changed to maximize weed prevention. The BLM already places restrictions on industry in a variety of ways to limit ecosystem damage and reduce the BLM's spending of taxpayer money. Without integrating timber and weed management, taxpayer money will be wasted. In my experience researching non-herbicidal weed control methods used by City Parks Departments (<http://www.pesticide.org/factsheets.html#alternatives>), looking at the whole management picture from construction and activity planning to promoting native plant health via healthy soil is crucial for prevention.

A failure to integrate logging and weed control management, especially in light of the WOPR and then BLM Vegetation Management EIS sequence, could reasonably be interpreted as a tactic to challenge environmental groups and the public, spreading their resources thinner and minimizing awareness of herbicides as poisons that accompany clearcutting.

2. Does not acknowledge the costs of increasing herbiciding.

Certainly, herbicides can kill invasive species that may outcompete native vegetation. However, the BLM ignores the certain negative impacts on native, especially aquatic species. Government is to do no harm. Without adequate testing of inert ingredients and the combinations of, the BLM cannot claim that this program will do more good than harm and with evidence that herbicides do harm both humans and ecosystems, the BLM cannot claim that its program will. Moreover, the 14 new herbicides that the BLM is adding to its toolbox have been in use by the other 16 Western states for less than one year. This is hardly long enough to know the consequences, both positive and negative.

3. Does not specify the “other weeds” or the “landscape health” for which it intends to manage.

4. Does not give the acreage over which it will apply herbicides.

5. Does not adequately demonstrate a strong, ongoing emphasis on prevention and alternatives.

The BLM does not demonstrate that, rather than merely failing to manage weeds in the Eugene BLM District, where since 1983 no herbicides have been applied, that it has put forth a concerted effort to develop effective, alternative methods. The BLM boasts its new Early Detection, Rapid Response system, which does not substitute for prevention in the context of thousands of acres and amid an economic recession.

6. The BLM erasing habitat corridors for aquatic species, like salmon, which depend on the safe haven of BLM islands amid the wasteland of private industry practices.

7. The BLM is negating the positive impacts on human health of recent county and state government decisions regarding right-of-ways.

Some of the same rural residents who have benefited from a halt to herbicide spraying along Lane County roads are going to suffer severe health effects from having to pass by BLM right-of-ways. [Reference comments by John Pincus.]

8. Chooses to listen to demands of self-interested private forest managers over local and state government that is taking action based on dialogue with citizens.

The courts ended herbicide use by the Eugene BLM district for a reason. Other government entities in Oregon have done the same and have put forth great effort to develop non-herbicidal weed control methods, listening to their citizens. The BLM should not override these more local decisions in favor of more risky herbicide use but rather seek to build trust between BLM and communities by engaging in non-herbicidal weed control partnerships.