

January 4, 2010

Bureau of Land Management
Vegetation Treatments EIS Team
P.O. Box 2965
Portland, OR 97218

Re: Vegetation Treatments Using Herbicides on BLM Lands in Oregon: Comments on Draft Environmental Impact Statement

To Whom It May Concern:

I am writing to you on behalf of Cascadia's Ecosystem Advocates (CEA, eco-advocates.org) in opposition to any increase (in amount or acreage) in herbicide application on public lands managed by the BLM, particularly the BLM's Preferred Alternative Four, No. 4. Our position is not exactly synonymous with the No Action Alternative, No. 1, however, because we do feel that some action is necessary: some nontoxic weed removal which will create real green jobs and changing forestry practices in order to prevent the spread of invasives. Implementing the proposed plan will put human and ecosystem health at substantial and unacceptable risk. The courts stepped in years ago to protect an innocent populace from the BLM's aerial poisoning of forests and rivers adjacent to their homes, as shown in the famous PBS documentary, *The Politics of Poison*. Implementation of the proposed plan without changing forestry practices that spread invasives would be wasteful and clearly against the public's interest.

1. Comment deadline extension

As noted in an e-mail by Todd Thompson, NRS Restoration Coordinator of the BLM, "the BLM will be accepting and fully considering all public comments received on the Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement through January 4th, 2010." We, therefore, expect the BLM to fully consider our comments herein.

2. Incorporation by reference

I incorporate by reference my comments on behalf of CEA to the BLM on the 17 Western States Vegetation Management Environmental Impact Statement (see attached). I also incorporate by reference the comments submitted by Jon Pincus (for the 17 Western States EIS) and Jan Wroncy for the current DEIS.

3. Lack of prevention

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 for my Master's thesis, looking at the whole management picture from construction and activity planning to promoting native plant health via healthy soil is crucial for prevention. Clearcutting and regeneration harvest contribute more toward the spread of invasives than any other practices routinely used by the BLM, although any movement of machinery from one place to another (without proper cleaning) will certainly spread weed seeds. Moreover, forest biomass extraction, by depleting native understory plants and robbing the soil of carbon, an essential nutrient, gives invasives a significant advantage over natives. Maintaining healthy native vegetation is crucial, as any land manager will say, in combating weeds. The proposed Early Detection, Rapid Response system does not substitute for basic, thoroughly tested prevention methods.

4. Lack of prioritizing nontoxic methods

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 employ nontoxic weed control methods already proven to be effective. The creation of green jobs is supposedly a high priority for the BLM, and manual removal of weeds is an ideal opportunity to employ rural residents in economically struggling communities.

5. Failure to consider a reasonable degree of tolerance

Many city parks departments have increased their tolerance of weeds and have achieved greater personnel and public satisfaction as a result. With invasives having become dominant across so much of the landscape and the economy in decline, it is preposterous to presume an ability to gain control over the invasive situation. Eradication is not a sane strategy, and, generally, we have more important battles to wage than the one on invasives. Invasive control must be carefully targeted to protect the most threatened native organisms at least cost.

6. Failure to acknowledge the costs to non-target organisms

Certainly, herbicides can kill invasive species that may outcompete native vegetation and be detrimental to other organisms in the ecosystem. In some cases, such herbicides kill invasives more efficiently and effectively than nontoxic methods. However, herbicides generally have a greater negative impact to non-target organisms, including humans. As proposed, the plan does not adequately take precautions to protect aquatic organisms or humans.

7. Lack of precaution

Without adequate testing of inert ingredients and combinations of herbicides and a general lack of disclosure of information on inert ingredients, the proposed plan is utterly reckless. Many of the herbicides that the BLM is proposing to add to its toolbox have been in use in the field for a relatively short period of time, so the negative impacts are still largely unknown. In addition, the plan proposes to apply herbicides to the areas it manages most populated by humans. Also, application of herbicides to BLM-managed lands will impact adjacent lands and humans and other organisms who inhabit them via chemical drift and runoff. More than 40,000 Oregonians live within half a mile of BLM land. With climate change and peak oil forcing adaptation reliant upon clean local water, a decision that would increase the challenges to our already overburdened waterways is utterly reckless and jeopardizes adaptation efforts.

8. Failure to manage cooperatively to maintain native habitat corridors

Increasing herbicide use will essentially erase habitat corridors especially for aquatic species, like salmon, which depend on the safe haven of BLM islands amid wide expanses of private toxic clearcuts. Just as the BLM has agreed to take up the State's slack in forest protection with regard to management plans (one of the great failings of the WOPR), the BLM should be bound to compensate for poor State management with regard to maintaining safe habitat for native organisms. The BLM has already actively destroyed much habitat through clearcutting and the conversion of biodiverse forests to tree plantations.

9. Negation of the positive impacts of recent county and state government decisions regarding roadside weed control

Some of the same rural residents, especially chemically sensitive people – See comments by Jon Pincus) who have benefited from a moratorium on herbicide spraying by Lane County and some of ODOT's territory will suffer once again when they have to drive past BLM right-of-ways. The BLM should cooperate with State and local governments that are showing success with nontoxic weed control methods and tolerance.

10. Serving the interests of the timber and chemical industries over the public's interest

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 put an end to its giveaways to the timber and chemical industries and instead serve the citizens by implementing only nontoxic weed control methods and forestry practices that preserve native ecosystems do not overwhelmingly spread invasives.

Any increase in herbicide use on public lands managed by the BLM would be an egregious additional assault on public health, ecosystem vitality, and the long-term security of our bioregion as it attempts to adapt to a changing climate. We demand that the BLM revise the DEIS to include only limited, nontoxic removal of invasives and end the forestry practices that are primarily responsible for the spread of invasives.

Respectfully submitted by

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M.P.A. degree, University of Oregon, 2009 (wrote Master's thesis on alternatives to herbicides)
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