

To: orvegtreatments@blm.gov; Vegetation Treatments EIS Team, Bureau of Land Management, Oregon State Office

From: Mary Camp, President, Deer Creek Valley Natural Resources Conservation Association, PO Box 670, Selma, OR 97538

Date: January 4, 2010

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

The Deer Creek Valley Natural Resources Conservation Association, also known as the Deer Creek Association (DCA), of Selma, in Josephine County, is a 30 year old community organization dedicated to retaining and restoring the health of forest and human communities in the Deer Creek and other watersheds. DCA comprised solely of volunteers is committed to its mission: *“To promote and protect environments and species that sustain the web of life and human communities.”*

We support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would fail to protect environments and species that sustain the web of life and human communities. The BLM needs to consider 21st Century solutions to protect extremely compromised and degraded ecosystems, and the dangerous threats to public health from practices that use toxic chemicals being proposed in Alternatives 2, 3, 4, and 5.

This is why we requested that the Natural Selection Alternative be given full consideration in the DEIS. The DEIS only fully considered and analyzed alternatives that would lessen protections for BLM forests and watersheds. Yet, there are laws such as the Endangered Species Act that the BLM has to violate in order to weaken these protections. The BLM alternatives would fail to meet its other obligations to protect clean water, recover endangered species and provide for recreation. BLM has failed to produce a reasonable range of alternatives and therefore cannot meet all of its legal obligations including to protect clean water and wildlife habitat.

BLM Vegetation Treatments EIS Team failed to consider and address the following issues raised in scoping comments by Deer Creek Association July 28, 2008:

BLM’s management practices that continue and increase the spread of non-native species must be changed. Until BLM managers deal with the cause of this problem they will be adding threats to biological, ecological, social and economic values on all forests and communities. BLM managers have a responsibility to fully assess the extremely harmful affects these chemicals will have on ecosystem and human health.

The Natural Selection Alternative (NSA) is a “reasonable” alternative under NEPA and should be analyzed by the BLM managers as an integrated strategy to manage invasive weeds and fire fuel density on public land. Preventative and passive vegetation management as prescribed in the NSA are proactive treatments for controlling invasive species, restoring native vegetation, and reducing fire fuel density on public land. The

BLM agrees that prevention is the best approach for managing invasive plants and passive restoration is a valid technique for vegetation management. BLM cannot avoid analyzing these techniques simply because they do not meet a traditional definition of vegetation “treatments:” “Passive treatments, by inherent definition, are not considered to be treatments that manipulate vegetation...”

The Natural Selection Alternative retains naturally evolved species, natural ecosystem communities and conditions that resist the invasion of non-native species. It would produce far more timber and other forest products along with perpetual local jobs while retaining all existing late successional and old growth ecosystems. The BLM should implement the Natural Selection Alternative to meet legal, social and environmental requirements for public lands. We request that the NSA (as presented for BLM’s South Deer Landscape Management Project, Medford District, BLM) be fully and equally assessed as an alternative in the EIS.

The EIS must address BLM’s own activities that contribute to the establishment and spread of invasive plants. The EIS needs to consider a complete and accurate assessment of science (including contrary science) and provide a robust assessment of the environmental impacts of the proposed program as required by NEPA.

DCA members concerns include a direct personal interest over the outcome of the proposed vegetation treatments because we live and work adjacent to BLM lands. We rely on the species that design, organize, regulate and regenerate our community ecosystems and sustain our quality of life. Many of us rely on water that originates on these lands for our domestic needs and organic practices. DCA has sponsored public tours for decades that include hiking on BLM lands to educate the public on how forests are sustained. Bringing these toxic chemicals into our living environment is a serious violation of our human rights.

Studies show hormone/endocrine disruptive chemicals have same effects as DES given to pregnant woman that resulted in all sorts of reproductive disorders and cancers. There is an effect at extremely low doses. The cumulative and trans-generational effects, and multitude other dangers to humans and all the species that make up these ecosystems that we depend upon for local to global health by herbicides in the proposed plan are known and well documented and discussed in great detail by individuals and organizations in comments incorporated by reference at the end of these comments.

We have found great and passionate agreement in opposition to the use of toxic chemicals on our public lands, including current and proposed herbicides. Repackaging chemicals and reframing their use will not escape the reality of the controversial nature of practices that incorporate the use of toxic chemicals; and the foreseeable reform demanded by an ever more informed and outraged public.

If Alternative One is not selected; DCA requests a Supplemental Impact Statement that includes a fair and objective scientific analysis of all aspects of the Natural Selection Alternative as compared with BLM alternatives; including all ecosystem values, services, products and uses including purification of air and water, nutrients cycle, pollination, herbs and medicinals,

recreation and tourism, healthy working environment, chemical drift, cumulative effects, the eminent and lethal threat to salmon and aquatic systems, carbon sequestration scenarios, and use of fossil fuels, just to name a few, which any appropriate 21st century forest practice must consider. No viable alternative can be assessed only in part, without looking at it with respect to all of its relationship aspects. The use of herbicides will not meet BLM purpose, need, goals and legal requirements.

We incorporate by reference comments on the Vegetation Treatments Using Herbicides on BLM Lands in Oregon DEIS by: Umpqua Watersheds, Cascadia Wildlands, Klamath Siskiyou Wildlands Center and the Center for Biological Diversity by Francis Eatherington; Oregon Wild and Center for Biological Diversity by Doug Heiken; The Northwest Coalition for Alternatives by Kim Leval; Siskiyou Project by Rich Nawa; Gaia Visions, Coast Range Guardians, Residents of Oregon Against Deadly Sprays and Smoke, and Citizens Environmental Protection Alliance by Jan Wroncy; by Maya Healer Gee; Pesticide Poisoning Victims United, a Division of The Pitchfork Rebellion by Day Owen; Blue Mountains Biodiversity Project (Karen Coulter, Director); Oregon Toxics Alliance (Lisa Arkin, Director); and Cascadia's Ecosystem Advocates by Samantha Chirillo.

We also include by reference: The Natural Selection Alternative for the South Deer Landscape Management Project, Medford District BLM, Jan 2005 and all appendices, attachments and references; and 8/6/05 EA comments for the South Deer Landscape Management Project (EA# OR110-05-10) by Dennis Odion, PH.D. Vegetation Ecologist. These documents are attached to this email, minus some attachments such as maps due to size limits.

Sincerely,
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This document submitted on line to orvegtreatments@bom.gov on Jan 4, 2010

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