OREGON TOXICS ALLIANCE

OTA works for all Oregonians to expose root causes of toxic pollution and help communities find solutions that protect human and environmental health.

January 5, 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 (DEIS)

The groups and individuals listed below submit these comments opposing BLM's proposed alternative to greatly increase herbicide use on BLM land in Oregon. We heartily support the Comments already submitted by Northwest Environmental Defense Center, KS Wild/Center for Biological Diversity, and Northwest Coalition for Alternatives to Pesticides, and hereby incorporate those comments by reference. Additionally, we offer the following further comments for BLM consideration:

- 'Encouraging' weed free feed for grazing animals and recreational pack animals is not sufficient. BLM should mandate weed free feed and hay for any grazing or pack animal on BLM land and should provide strong inspection and enforcement measures to ensure its mandate is followed.

- BLM states that commodity enhancement (e.g. timber production) is not a factor in choosing to use herbicides, but then somewhat contradicts itself when it uses the justification of a cost increase to adjacent landowners as one of the stated purposes of the proposed action. Increased costs to ranchers are specifically cited as a reason for increased herbicide use. BLM complains that it cannot efficiently cooperate in jointly funded projects to remove invasive species and prevent their re-infestation because it does not have the same tools as adjacent landowners. Purpose 5.

- BLM should implement a stronger Integrated Vegetation Management Program/Last Resort Policy to ensure that chemical herbicides are used only when there is no feasible alternatives. BLM dismisses the use of Vinegar because it is 'not an approved herbicide in Oregon.' However, other than the four herbicides currently permitted by the district court injunction, none of the other herbicides are currently 'approved in Oregon.' BLM could easily examine the suitability of using nontoxic herbicides in Oregon instead of jumping into the expanded use of chemicals with known toxicity to humans and wildlife. Furthermore, research indicates that chemical use can exacerbate the invasive species problem in many instances. BLM should thoroughly examine and compare the full range of potential harmful and beneficial effects of using chemical herbicides and nontoxic alternatives before it chooses its preferred alternative.

- See, eg. *Control Effort Exacerbates Invasive Species Problem* journal article. http://www.ars.usda.gov/research/publications/publications.htm?seq_no_115=215397. That study in its entirety is hereby incorporated by reference.

- Studies indicate that vinegar herbicides can perform as well or better than chemical herbicides. *See, e.g.,* Cornell University Study on Vinegar herbicides found at http://www.ccerensselaer.org/Horticulture-Program/Turfgrass-Research/Vinegar-Herbicide.aspx.

- Other miscellaneous problems in BLM's current DEIS analysis and possible solutions include the following:

  - Recent USGS studies have found the widespread presence of herbicides in Oregon waters, including drinking water supplies. The full range of USGS studies on pesticides and water quality is found at the USGS Pesticide National Synthesis Project website, http://water.usgs.gov/nawqa/pnsp/. BLM should take these ongoing problems into account in choosing the most suitable alternative.

  - Cost effective analysis of herbicide use should include both sides of the cost equation. I.e., BLM cannot just say that manual removal is cost prohibitive and therefore not a feasible method of invasive plant removal. BLM must also analyze the environmental and health costs of using the herbicides. Studies showing the impacts of pesticides on human health have been published by Oregon Environmental Council. *See, e.g., The Price of Pollution: Cost Estimates of Environmental Disease in Oregon,* estimating those costs on an annual basis to be $1.57 billion. That report in its entirety is hereby incorporated by reference. The report can be accessed at http://www.oeconline.org/our-work/kidshealth/priceofpollution.

  - Many of the studies BLM has used in assessing the environmental and human health risks are old and outdated. BLM should thoroughly examine all current scientific literature on these herbicides before deciding on the preferred alternative.

  - Weed management program grants – BLM should thoroughly explore possibility of obtaining these available funds to expand manual removal programs and to test the feasibility of using alternatives such as vinegar and other available nontoxic herbicide formulations.

  - Stimulus funds – BLM should seek federal stimulus funds to provide much-needed jobs in the arena of nontoxic removal/management of vegetation and ecosystem restoration. These jobs could be modeled along the lines of WPA projects of the 1930's.

- BLM should search for ways to coordinate and cooperate with other federal agencies seeking to study the effects of and reduce the toxic impacts of pesticides to our human and wildlife communities.

Thank you very much for the opportunity to comment on this DEIS. We look forward to hearing BLM's responses to all of the comments.

Sincerely,

Dona Hippert, President
Lisa Arkin, Executive Director
Oregon Toxics Alliance

Lesley Adams, Rogue Riverkeeper
Klamath-Siskiyou Wildlands Center

Amy Harwood, Program Director
Bark

Richard K. Nawa, Staff Ecologist
Siskiyou Project

Nina Bell, Executive Director
Northwest Environmental Advocates

Jan Wroncy
Canaries Who Sing

Mary Camp, President
Deer Creek Valley Natural Resources Conservation Association

Tom Dimitre, Gordon Lyford, and Elaine Wood
Rogue Group Sierra Club

Daryl Jackson, Biologist
Willamette Waterways Project

Francis Eatherington
Umpqua Watersheds, Inc.

Ingrid Edstrom
Citizen

Mari Anne Gest, Executive Director
Oregon Center for Environmental Health

Maxine Centala
Concerned Citizens for Clean Air

Tom Kerns
Environment and Human Rights Advisory

Amy Pincus Merwin
InForm Media