(1)

jean public
<usacitizen1@live.com>
10/02/2009 06:22 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject FW: Delivery Status Notification (Failure)

From: postmaster@mail.hotmail.com
To: usacitizen1@live.com
Date: Fri, 2 Oct 2009 18:20:51 -0700
Subject: Delivery Status Notification (Failure)

This is an automatically generated Delivery Status Notification.

Delivery to the following recipients failed.

orvegtreatment@blm.gov

--Forwarded Message Attachment--
From: usacitizen1@live.com
To: orvegtreatment@blm.gov; woinfo@blm.gov; americanvoices@mail.house.gov
Subject: public COMMENT on federal register
Date: Fri, 2 Oct 2009 21:20:44 -0400

i do not think the new toxic chemicals are any beter than the old ones. we all need to stop using so many toxic chemicals. you can pull out weeds. you dont hae to drown earth in toxic chemicals. epa passes all toxic chemicals that come before it. none of them are truly safe. epa works for toxic polluters,not forsafety for american citizens.

jean public 15 elm st florham park nj07932
>
>
> [Federal Register: October 2, 2009 (Volume 74, Number 190)]
> [Notices]
> [Page 50986-50987]
> From the Federal Register Online via GPO Access [wais.access.gpo.gov]
> [DOCID:fr02oc09-62]
>
> ---

(2)

"Arthur Coulton"
<art@apbb.net>
10/03/2009 11:26 AM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Re: Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft EIS now available

I wish to protest the use of herbicides anywhere in Oregon, their use has been proven to be a health threat in many studies. Their use is not cost effective when health care casts are considered.
Arthur Coulton
3269 Humbug Creek Rd.
Jacksonville, Or. 97530
----- Original Message -----
From: <orvegtreatments@blm.gov>
To: <orvegtreatments@blm.gov>
Sent: Saturday, October 03, 2009 9:08 AM
Subject: Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft EIS now available

>
> Dear Interested Party,
> The Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft
> Environmental Impact is now available for public comment. The document
> and
> the summary of the document can be downloaded at
> http://www.blm.gov/or/plans/vegtreatmentseis/, or you can request a
> printed
> copy by contacting the team at the addresses below. If you have already
> requested a printed copy, you will be receiving it shortly. The public
> comment period closes on December 1st.
>
>
> Comments can be emailed to this address (orvegtreatments@blm.gov), mailed
> to Vegetation Treatments EIS team, PO Box 2965, Portland OR 97208-2965, or
> submitted online at http://www.blm.gov/or/plans/vegtreatmentseis/.
>
>
>
>
>
> Thank you for your interest in this process,
>
> .
> The EIS Team
>
>
> Vegetation Treatments EIS team
>
>
> PO Box 2965
>
>
> Portland OR 97208-2965
>
>
> orvegtreatments@blm.gov

(3)

maryann@junehog.com
10/03/2009 12:34 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Mary Ann Kruse

Requestor: Mary Ann Kruse
E-mail address: maryann@junehog.com

Comments:
To Whom It May Concern:

Reviewing Table S-2, PROJECTED ANNUAL NOXIOUS WEED SOURCES & ACREAGE CHANGES FOR EACH ALTERNATIVE, Alternatives 3, 4 & 5 look to have the best overall weed kill outcomes. However, looking @ the numbers of herbicides used in Alternatives 3, 4 & 5 would indicate that Alternative 4 utilizes the fewest herbicides for the greatest effect of all variables.

I would encourage further consideration for the choice of Alternative 4. However, I would eliminate the use of herbicide 2, 4-D from your list, given this herbicides potential for ill health effects in humans, fish, birds, invertebrates, wildlife, in general.

Thanks for the opportunity to comment. It is most appreciated.

Sincerely,

Mary Ann Kruse

(13)

rec 10/8

October 6, 2009

Vegetation Treatment EIS Team
P.O. Box 2965
Portland, Oregon 97208-2965

EIS Team:

This letter is in response to a call for Comments concerning the Draft Environmental Impact Statement Summary – Bureau of Land Management Vegetation Treatments Using Herbicides on BLM Lands in Oregon. The Document was dated September, 2009.

There is no mention of groundwater or well water potential contamination by herbicides. Mention should be stated on Page 7, "Human Health and Safety".

Although herbicide manufacturers usually state the half-life of their herbicide molecular breakdown, there is always half of a half, **etc** remaining. These molecules can enter the soil and be carried distantly by water. Witness large nitrate contamination of well water from chemical applications to crops in some locations of far eastern Oregon and portions of the Willamette Valley.

If herbicides, applied to plants, should infiltrate the ground and enter a water source such as an Artesian spring, or just percolate through the soil, widespread and possibly distant contamination of pure water could result. Downstream water users would be put into jeopardy.

There will be a short-term gain from Alternative 2 through 5, but the risks are too great. Best to choose Alternative 1.

Greg Foster

Greg Foster
4029 NW Tamarack
Corvallis, Oregon 97330

(9)

pdxvx@live.com
10/03/2009 10:47 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - J. Brooks

Requestor: J. Brooks
E-mail address: pdxvx@live.com

I would like to opt out of the email list.

Comments:
The noxious effects of toxic herbicides is more concerning than weeds. Returning the environment closer to a pre-civilized Eden is what I\'ve held in mind.

5)

MICHELLE DEFORD
<d4d@q.com>

10/05/2009 10:09 AM

To <orvegtreatments@blm.gov>
cc
bcc
Subject

I don't like the idea of spraying herbicides in any forest! It will end up in the water or in the courts and be a large waste of govt. money and people.

Let's put people to work on the weed problems. Right now people need jobs!

No herbicides!

(6)

Amanda Stanley
<amandagstanley @gmail.com>
Sent by:
amanda@appliedeco.org

10/05/2009 10:13 AM

To orvegtreatments@blm.gov
cc
bcc
Subject Support for preferred alternative

To whom it may concern:
While I am reluctant to encourage the use of herbicides on public lands, the scope and magnitude of the invasive weed problem is so large that land managers must have all tools available to them. Invasive weeds cause substantial damage to biodiversity, ecosystem function, and local economies. Often herbicides are the only effective way to treat invasive weeds, as other methods (mowing, mulching, hand-pulling, biological control) simply don't work. As a restoration ecologist, I face the enormity of the problem in my own work. My research has demonstrated that herbicides are often the most effective means of weed control. The BLM should be allowed to use these tools judiciously in order to preserve the quality of our public lands.

Sincerely,
Amanda Stanley, Ph.D
Restoration Ecologist

4320 NW Queens Ave,
Corvallis, OR 97330

(7)

Connie Eastburn
<vern_connie@yahoo.com>
10/05/2009 04:51 PM

To orvegtreatments@blm.gov
cc
bcc
Subject In favor of herbicides

I am very much in favor of the use of herbicides in treating invasive plants and other weeds throughout the state. I am a land owner of properties in Lane, Douglas Lake and Deschutes counties totalling more than 200 acres. On each property, invasive non-native species are present. I spend the vast majority of my spare time (and I am retired) attempting to keep certain species out. From cheat, ragwort, Scottsbroom, European ivy, and others, I stay busy. Aldo Leopold stated in, "Sand County Almanac" that, "There is, as yet, no sense of pride in the husbandry of wild plant and animals, no sense of shame in the proprietorship of a sick landscape. We tilt windmills in behalf of conservation in convention halls and editorial offices, but on the back forty we disclaim even owning a lance."

I own a lance and it strongly resembles a shovel. How can I help?

Vern Eastburn

(8)

spiralmom@peak.org
10/06/2009 01:03 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Eron King

Requestor: Eron King
E-mail address: spiralmom@peak.org

Comments:
I am absolutely against the use of herbicides or pesticides on the BLM lands. All are bad for the environment, including and particularly salmon and other fish. The people that I deal with belonging to the BLM organization have always been proud about not using such things on their property. I and my neighbors are surrounded by private timber that constantly hammers us with aerial sprays. The use by BLM would double the amount of poisons that are sprayed over our houses, our food, our animals, and most importantly our children. PLEASE DO NOT USE HERBICIDES OR PESTICIDES ON YOUR LANDS!!!

(9)

stuart phillips
<stulips@hotmail.com>

10/06/2009 05:35 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject comment

Please DO NOT use any pesticides, chemicals, herbicides or sprays at all on any public blm lands ever, to eradicate anything, just leave the lands alone please, thankyou. Stuart Phillips, Eugene, Oregon

(96)

COMMENT PRINTED 10/26/09

TAC

(2 OF THE SAME COMMENTS RECEIVED)

Ed Shepard/ORSO/OR/BLM/DOI
10/26/2009 11:49 AM

To Todd Thompson/ORSO/OR/BLM/DOI@BLM
cc
bcc
Subject

same email/message rec to veg email address on 10/6

For your record

Ed Shepard
OR/WA State Director
(503) 808-6026
----- Forwarded by Ed Shepard/ORSO/OR/BLM/DOI on 10/26/2009 11:40 AM -----

stuart phillips <stulips@hotmail.com>
10/26/2009 10:23 AM

To <ed_shepard@blm.gov>
cc
Subject

Please DO NOT use any pesticides on any BLM public land at all, it is highly toxic, unhealthy to all, and ridiculous, please do not use pesticides on any public BLM land in oregon or washington, thankyou! Stuart Phillips, Eugene, Oregon, do not use any pesticides on public land in Oregon at all, it is devastating to all living beings! Thankyou. Stu

(10)

"Eric Kranzush"
<Eric@giustinaland.com>
10/08/2009 10:33 AM

To <orvegtreatments@blm.gov>
cc
bcc
Subject EIS - Support for Alternative 4

Sir or Madam,

Pursuant to the public comment period associated with the Draft EIS for "Vegetation Treatments Using Herbicides on BLM Lands in Oregon" I wish to submit the following comments:

As a public land manager you have been dealt a very difficult hand to play. Society demands you maintain the health and productivity of our forests while continuously layering overlapping (and sometimes competing) rules over top. The real truth of the matter is that society has asked you to take on Mother Nature (as wicked as she is at times) and to do it with two arms and one leg tied behind your back. What society has yet to realize that your lands are inhabited by organisms that wish to do nothing but survive vigorously and prosper regardless of the surrounding environment, sometimes contrary to our philosophical hopes and wishes (as constrained by current management restrictions). As a result, Mother Nature is defeating your efforts. Noxious and invasive weed spread on your lands is a serious "growing" problem that should not rest on philosophical hopes and wishes (current management restrictions) alone. In my opinion, you are asking for permission to deploy these new tactics, when appropriate, because past practices we have forced upon you have yielded unacceptable results....not because your managers have made bad decisions, but because the tools they have been allowed to use were inadequate for the task at hand.

I formally support the Oregon Bureau of Land Managements preferred Alternative 4 in order to control the spread of noxious and invasive weeds on BLM land in Oregon. Your professional staff should be allowed access to a full suite of tools in order to successfully control noxious and invasive weeds.
I support your position and your professional judgment in selecting this alternative.

Importantly, while I support your staff's professional deployment of these tools, I do so while demanding accountability.

Thank you for the opportunity to comment,

Eric Kranzush
Oregon Resident
Professional Forester

a_scherr@yahoo.com
10/07/2009 01:49 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Anthony Scherr

Requestor: Anthony Scherr
E-mail address: a_scherr@yahoo.com

Comments:
If you are not going to do anything about cattle grazing, then why bother with herbicide spraying. Sounds like another welfare benefit for the ranchers , not the public.

(12)

Marta Boyett
<marta@epud.net>

10/08/2009 12:17 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Herbicide application

Dear Sirs and Ms's:
Please eliminate, or at least minimize, all herbicide applications on public lands—do not increase them.
Thank you,

--
Marta Boyett
89819 Demming Road
Elmira, OR 97437
541-935-8080
marta@epud.net

bk75bradley@comcast.net
10/09/2009 01:35 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Brian A. Bradley

Requestor: Brian A. Bradley
E-mail address: bk75bradley@comcast.net

Comments:
I suppport the proposed alternative to deal with the threat of invasive species. The use of target specific herbicides is a safe method of effectiviely controlling plant species that left unchecked can do serious environmental damage. Native species are often lost when invasives become established.

(15)

Philip Ratcliff
<skazz999w@hotmail.com>

10/11/2009 09:00 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject DEIS-Herbicides on BLM lands in Oregon

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208-2965

To Whom It May Concern:

I wish to comment on the Draft Environmental Impact Summary, regarding vegetation treatments using herbicides on BLM lands in Oregon.
I'm a former Oregon resident, and I remember the controversy over herbicide use when I lived there. I remember the spontaneous abortions suffered by women in Alsea, when the Alsea River was contaminated by herbicide spraying. I participated in mulching fir seedlings, when Lorane residents asked for volunteer help. The residents were worried that herbicides used for brush suppression would contaminate the creek that supplied their water. The mulching eliminated the need for herbicides. I toured BLM sites that were scheduled for 5,000 acres of spraying in four districts. The BLM conducted the tour in a small bus.
Thus, when I read of BLM's plans to expand herbicide use beyond noxious weeds, for multiple uses, nearly tripling the acreage treated, and potentially using 14 new herbicides, I feel that the BLM is escalating out of control.
The Summary doesn't indicate how long the various herbicides remain toxic in the environment. The Summary indicates that diquat would be used only when five other aquatic herbicides don't work. Applying up to six herbicides into ponds and lakes is irresponsible.
Applying herbicides to kill various types of vegetation is the cheapest, least healthy alternative for fauna, humans, and the ecosystem. The health effects of herbicides appear not to have been factored into the cost/effectiveness equation.
The massive escalation in herbicide-affected acreage, and the sudden inclusion of up to 14 additional herbicides, means that the past policies of the BLM have failed. It is evident that the BLM is trying to remedy its past failure by sudden remedial measures. The ecosystem's health should not pay the price for the BLM's escalation.
I urge the BLM to seek alternatives that minimize the use of herbicides, such as crews using hand suppression, herds of goats as used in California, etc. These methods are more expensive, but not as much as when health is factored into the equation.

Philip Ratcliff
15 Foster Ct.
Cloverdale CA 95425

(16)

Erna Gilbertson
<naturesimages541@AOL.com>

10/12/2009 11:12 AM

Please respond to
Erna Gilbertson
<naturesimages541@AOL.com>

To orvegtreatments@blm.gov

cc

bcc

Subject Ken Denton! Your Friend Erna Gilbertson wants you to check out Whole World Pledge!

~~~~~~
Greetings Ken Denton,

A friend of yours, Erna Gilbertson (naturesimages541@AOL.com), thinks you would be quite interested in this great site - Whole World Pledge
~~~~~~
The Whole World Pledge offers a tool to create a future that works for everyone.

You are receiving this email because your friend saw the possibilities of the Whole World and wanted to share it with you.

Check it out! You can:

- Take the Whole World Pledge
- Join the community
- Learn more about WWP
- Get involved in a growing group of people excited about a world that works, share your ideas, and help bring WWP into more and more spheres of our world!
- And lots more...

~~~~~~
Check out the site at: http://wholeworldpledge.org/wwp/

~~~~~~
Erna Gilbertson's personal message to you:

How long will we -humans- keep poisoning this very place we call "home". Please consider the damage done to our Living Mother Earth. WHY poison ourselves??????

(17)

janme@nu-world.com
10/12/2009 12:00 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Jan Meredith

Requestor: Jan Meredith
E-mail address: janme@nu-world.com

I would like to opt out of the email list.

Comments:
It is time to stop polluting the very elements that support life. We cannot afford to keep poisoning our world! We have the technology. We have the opportunity. We need governmental agencies to do the right thing!

(18)

Neil.Crawford@plumcreek.com

10/12/2009 01:44 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>

cc

bcc

Subject Oregon Vegetation Treatments Draft EIS Comments - Neil Crawford

Requestor: Neil Crawford
E-mail address: Neil.Crawford@plumcreek.com

I would like to opt out of the email list.

Comments:
I believe the BLM is negligent in its responsibility as a land manager if it does not properly use the appropriate herbicide to control noxious weeds.

rec 10/12

Julian, CA
Oct 6 2009

To
Veg. Treat. EIS Team
PO Box 2965
Portland, OR 97208-2965

Subject: Comments on Veg. Treat. Summary

1) Proposal 4 is generally a great improvement on the present situation.

2) I believe AMINOPYRALID should be added to the materials approved under proposal 4

This would add one more effective option to help manage invasive & noxious weeds.

Sincerely

Franklin L. Woody BARNES IV
PO Box 1570
Julian, CA 92036

PS my observations, while limited, have included Lake & Klamath Counties OR & Tehama & San Diego Counties CA.

(20)

Susi Klare
<susiklare@yahoo.com>

10/18/2009 09:07 PM

Please respond to susiklare@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Re: Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft EIS now available

Thank you for providing me with the opportunity to comment. My request is simple. Please do not allow any more applications of toxic chemicals on our public lands. It's time to stop degrading Oregon's waterways and fisheries, our water table, our native soils and ecosystems. Can we stop poisoning our planet now, please?

I request you make the above comments part of the public record.

Susanna DeFazio
87805 Walker Creek Road
Walton, OR 97490

--- On Sat, 10/3/09, orvegtreatments@blm.gov <orvegtreatments@blm.gov> wrote:

> From: orvegtreatments@blm.gov <orvegtreatments@blm.gov>
> Subject: Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft EIS now available
> To: orvegtreatments@blm.gov
> Date: Saturday, October 3, 2009, 9:08 AM
>
> Dear Interested Party,
> The Vegetation Treatments Using Herbicides on BLM Lands in
> Oregon Draft
> Environmental Impact is now available for public
> comment. The document and
> the summary of the document can be downloaded at
> http://www.blm.gov/or/plans/vegtreatmentseis/, or you
> can request a printed
> copy by contacting the team at the addresses below.
> If you have already
> requested a printed copy, you will be receiving it
> shortly. The public
> comment period closes on December 1st.
>
>
> Comments can be emailed to this address (orvegtreatments@blm.gov),
> mailed
> to Vegetation Treatments EIS team, PO Box 2965, Portland OR
> 97208-2965, or
> submitted online at http://www.blm.gov/or/plans/vegtreatmentseis/.
>
>
>
>
>
> Thank you for your interest in this process,
>
>
> The EIS Team
>
>

(21)

rec: 10/19

Oct. 15, MMIX

BLM Vegetation Treatment EIS
Draft Environmental EIS

Dear BLM.

I support the proposed alternative #4, to control invasive and noxious weeds. In my opinion, this is the most dangerous threat to our environment and to endangered species, and native wildlife. In my opinion the damage to the environment far exceeds the questionable, minimal short term effects, that the herbicides will have on the environment.

Sincerely,

Bill Meyer

(22)

rec: 10/20

Lynda Blumenthal
15260 So. Myrtle Road
Myrtle Creek, OR 97457

October 18, 2009

To:
Vegetation Treatment EIS Team
PO Box 2965
Portland, OR 97208-2965

Re: DEIS: Vegetation Treatments Using Herbicides on BLM Lands in Oregon

I have read the DEIS *Summary* carefully and have spoken with another concerned and informed landowner and have concluded that NO herbicides at all should be being used on our public lands, except in rare cases in small areas where absolutely no other alternative exits. So I do not support any of the alternatives.

I would urge you to look at the cause of the spread of weeds. Cattle grazing leads to the spread of weeds. Clear cutting leads to the spread of weeds. Stop or drastically limit these practices and weed-spread will decline.

In the meantime, the weeds you wish to eradicate should be addressed by hired labor to cut/pull/dig weeds. In these difficult economic times providing jobs for this project would be far more better use of public land and resources.

Sincerely,

Lynda L. Blumenthal

(23)

james.sowerwine@gmail.com

10/21/2009 04:33 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>

cc

bcc

Subject Oregon Vegetation Treatments Draft EIS Comments - James Sowerwine

Requestor: James Sowerwine
E-mail address: james.sowerwine@gmail.com

Comments:
Both alternative three and alternative four are appropriate, viable options for controlling invasive plants and pathogen outbreaks such as sudden oak disease. My personal viewpoint is that herbicide application should be avoided when viable vegetation treatment alternatives are available, such as when clearing roadsides of vegetation or maintaining safety zones around infrastructure and buildings (such measures can generally be achieved by mowing and hand clearing). While the agency will be able to continue to maintain buildings, roads and other infrastructure without the use of herbicide application (California BLM does so successfully, it should be noted), the expansion of herbicide options available for invasive plant and pathogen control in Oregon is essential if populations of rare and sensitive species and native habitats are to be maintained in the future. Alternative four, and more acutely, alternative three balance BLM\'s need for herbicide application for environmental protection tools against the concerns of those members of the public opposed to the unplanned use of herbicides.

rec: 10/24

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Loraine Baker Hanley 84671 Sarvis Berry Ln Eugene OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(24)

(25)

rec 10/24

October 22, 2009

BLM

To Whom It May Concern:

As a resident of the state of Oregon, I urge you to not use (o use) 2,4-D in our beautiful forests.

Thank you for preserving a "safe" "clean" environment for my children and grand-children

Victoria A. Koch
1525 W. 12th Ave.
Eugene, OR. 97402

rec 10/24

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Lara Sernoffsky POB 5853 Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(26)

rec 10/24

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jacob Richardson 791 Polk St. Eugene, OR 97402

✓ I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

✓ I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

✓ I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

✓ I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(27)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Martin Held, 15080 NE North Valley Rd, Newberg, OR 97132

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(28)

4/24 2:24

(29)

davidareed@centurytel.net
10/24/2009 08:27 AM

To orvegtreatments@blm.gov
cc
bcc
Subject comment

To whomever it may concern: As a landowner adjoining BLM lands, I greatly support your efforts to obtain the use of more effective chemicals to control weeds on BLM lands. I support the use of these chemicals to help control the bad weeds on BLM land. Sincerely, David Reed

rec 10/25

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Rob Hoffman 24892 W. Demming Rd. Elmira, OR 97437

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(20)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

rec 10/25

Dear BLM, my name and address are: Mr. & Mrs. T.R. GLASOW
1900 W. 34th Ave, 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(21)

rec 10/25

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Joseph Tellscheer 145 Heritage Ave. Eugene, OR 97404

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides -- because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(32)

STOP POISONING US FOR PROFIT!!

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

rec 10/25

Dear BLM, my name and address are: Susan Flynn, 145 Heritage Ave, Eugene, OR 97404

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Asa Tellschow, 145 Heritage Ave, Eugene, OR 97404

rec 10/25

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

rec 10/25

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Avery Safehaven, 145 Heritage Ave, 97404 Eugene, OR

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(36)

joshuah@cwug.org
10/26/2009 12:30 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Josh Harrison

Requestor: Josh Harrison
E-mail address: joshuah@cwug.org

Comments:
I support the judicial use of herbicides on BLM lands. I understand that control of invasive weeds is absurdly difficult without herbicides. I understand that many other agencies use herbicides. As long as proper use guidelines are followed I have no problem with pesticide use.

rec 10/27

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Dr. G.W. Freed-Rowland 82161 LOST CRK Rd. Dexter, OR 97431

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.
Also poisoning watersheds which also has huge repercussions

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift. animals & humans

PLEASE, your job parameters have to change for your own good & your family!
I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!
It no longer can be seen as "US" against Them" anymore

(34)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: SANDRA PARNELLE 40035 Jasper-Lowell Rd. Lowell, OR 97452

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Robyn Hathcock P.O. Box 30044, Eugene, OR 97403

Rec. 10/27

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(39)

rec 10/28

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: KATHRYN KAPLAN Box 3518 EUG, OR 97403

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

40

(41)

rec 10/27

Aldine Rubinstein
2555 Jackson Street
Eugene, Oregon 97405
10-26-09

VEGETATION TREATMENTS EIS Team:

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT ON BLM HERBICIDES

I am concerned about the following:

- your proposed Action Alternative FOUR for authority to "spray all vegetation"
- The absence of analysis of "inert ingredients" and of a definition of "drift" as including vapor.

I support ALTERNATIVE ONE, "No herbicides".

Thank you,

Aldine Rubinstein

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

rec 10/27

Dear BLM, my name and address are: Kay Wiley - 1688 Lincoln, Eugene, Or. 97401

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron. THINK!! of our planet!!

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift. SHAME, SHAME Say it I could not better, so Please listen

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison." (NOT GOOD)

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits! COME ON – GROW-UP You Guys - POISON IS POISEN

(42) 4p.

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

10/27 rec

Dear BLM, my name and address are: Susan Barahart Michael Carrigan 1439 W. 44th Ave Eugene, OR 97402.

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(43)

rec 10/27

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Lotte Steisinger 2075 Hayes St Eugene OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(42)

rec 10/27

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: CHRISTINE HANKS 945 MADISON ST. APT. C EUGENE 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(45)

rec 10/27

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Katherine J. HEER-P.O. 11262-EUG. OR. 97440

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(46)

rec 10/27

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Emma Leyburn 93903 Swamp Crk Rd Blachly OR 97412

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(47)

rec 10/27

Fill Out the Following Coupon NOW and Mail to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: d. maria. 350 Pearl #414-97401

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(98)

rec 10/27

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: OLYMPIA MINARD, 1595 W. 11th AVE, EUGENE OR 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(40)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

rec 10/27

Dear BLM, my name and address are: Tippi Pollet 2336 W. 29th Ave, Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(50)

rec 10/27

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Ken Stern - 2326 W. 29th Ave., Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(51)

(52)

ericg@rfpco.com
10/27/2009 09:12 AM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Eric Geyer

Requestor: Eric Geyer
E-mail address: ericg@rfpco.com

Comments:
Support the use of EPA-approved herbicides on BLM

*The herbicides identified for use on BLM properties in the Draft EIS have all gone through extension testing by the EPA and have been deemed minimal or no risk to human health if used according to the label for each product. By law, the applicator bears the responsibility to be trained in the use of these products and follow the label instructions. Despite anecdotal stories from a few members of the public who have an agenda to stop all pesticide use, the extensive body of science clearly indicates a huge safety factor when these products are used properly.

*Waste is an unacceptable approach to any use of public resources. Herbicides offer the most efficient and effective option to vegetation management and control of noxious and invasive plants. The economic cost savings are well-documented, and control lasts much longer than manual or mechanical control, thereby limiting entries and costs. The cost savings can enhance other environmentally sound projects that are currently being ignored. The reduction in mechanical entries may reduce carbon emissions and other pollutants that are potentially more detrimental to the environment than herbicides that quickly break down to natural elements in the environment.

*There is nothing inherently wrong with enhancing timber production. The use of herbicides for these endeavors is a recognition of our responsibility to efficiently grow renewable resources for human use. No other building resources are as environmentally sensitive and green as wood. Herbicides allow for increased productivity per acre and, therefore, minimal usage across the landscape. Despite the fact that this Draft EIS only addresses a few specific herbicides for limited purposes, all EPA tested and approved pesticides should be available for responsible use on public land for multiple uses to maximize efficiency and resources.

*Anti-pesticide advocacy groups refer to various \"recent studies\" that support their beliefs. In reality, many of these \"studies\" are heavily biased in design and/or conclusions. The fact is that no scientific entity has studied herbicides for toxicity more than the EPA and should be trusted more. Additionally, \"studies\" showing potentially significant negative health or environmental impacts often reference pesticide products that were applied without proper regard for the label restrictions.

forest workers who use EPA-approved herbicides on a daily
more exposure than anyone. It would only seem logical
professionals or their families would show any negative
impacts on a much higher scale than the general public. Yet,
not the case. Rather, pockets of anti-pesticide advocates
form in \"zones\" based on concerns typically promulgated
scare tactics from a few people with an agenda.

ert ingredients are not \"more toxic\" than the active ingredient,
a few have claimed. By definition, inert means non-reactive, not
readily changed by chemical or biological reactions.

*Waterways are well-protected from herbicide applications. Accidental pollution is essentially non-existent with responsible herbicide applications. Products applied according to the label, with care, do not enter waterways or harm fish, at least according to a large body of scientific evidence.

*Warnings of negative health impacts exist on a myriad of everyday products in society, just like those on pesticide products. The warnings are intended to ensure that the user understands the importance of proper usage of the product. Caffeine, for example, is \"more toxic\" than many herbicides on the list, yet it is consumed daily by a huge segment of the population. If someone ingested caffeine at a higher rate than recommended, they would surely incur negative health impacts.

Herbicides are environmentally-sound, economically-efficient, safe products that, when used properly, promote the stated values of the public resource asset that is the BLM.

(53)

"ltrafton"
<ltrafton@citlink.net>
10/27/2009 08:38 AM

To <orvegtreatments@blm.gov>
cc
bcc
Subject DEIS Comments - Vegetation Treatments Using Herbicides on BLM Lands in Oregon

In case you can't open the attached older WORD file, the text is pasted below.

DATE: October 27, 2009

TO: orvegtreatments@blm.gov
Todd Thompson
Restoration Coordinator, BLM
PO Box 2965
Portland, OR 97208

FROM: Lawrence and Gina Trafton
2868 Castaway Drive
Lake Havasu City, AZ 86406

SUBJECT: DEIS Comments – *Vegetation Treatments Using Herbicides on BLM Lands in Oregon*

1. Applies to both Summary and DEIS:
   a. Tables: need to clearly identify No Action and Proposed Action alternatives in the headers. Perhaps you omitted these labels intentionally, but it could be argued that you intentionally are trying to dissuade the public from commenting on this DEIS. Make it easy on the public…be transparent. Remember the requirement to involve the public; are you doing all you can to facilitate their understanding and commenting on the document?
   b. Include costs and benefits. Even though it is not a BLM requirement, blaze a trail and show the true cost of weed infestation (in terms of resources and effects on income). Use tables and graphs. Resources would include timberlands, fire suppression, grazing, recreation, wildlife and threatened and endangered species.
   c. When BLM goes to Congress for your budget, it is all dollars and cents. Conduct an economic analysis for the EIS. The impact analysis will show that it is cost effective to be prepared to act quickly and treat weeds. Make economics a vital segment of the analysis of impacts. Documentation is critical because funding will become harder to obtain in the future. Projects that can document impacts and results (especially in terms of dollars) will be funded before projects that have vague analysis.

2. Summary

a. Page 1 defines Native Vegetation to "include native and desirable non-native plants". Explain why are non-native plants included in the definition? (If this is explained in the DEIS, ignore this comment.)

b. Most readers will read only the Summary section (as opposed to the nearly 500 page DEIS). Provide costs and benefits and/or refer to specific pages in the EIS. A 500-page document is not easy to navigate; make it easy for the reader.

3. The format is confusing. Seems like many of the sections have been moved from the standard EIS format (i.e. Affected Environment in Chapter 3 and Environmental Consequences in Chapter 4) for no benefit.

a. Overall format: readers can easily "get lost" in such a large document. Consider creating "sections" within the document. Then create footers to show that the reader is in Summary, Chapter 1, Chapter 2, etc.

b. Chapter 1: should include text from Conflicts and Consistency with Other Plans, page 328 to around page 12.

c. Chapter 2: move the Comparison of Effects of Alternatives (beginning on page 24) to where it belongs in Chapter 4 (you know… the ol' Environmental Consequences section). While the existing text can be used in the Summary, it does not belong in Chapter 2. Effects belong together in one location.

d. I am not comfortable with combining Affected Environment with Environmental Consequences (Chapter 4). And, moving Comparison of Effects of Alternatives to Chapter 4 (my comment 2b) will only complicate the chapter. Consider breaking Affected Environment with Environmental Consequences into separate chapters.

e. Chapter 4: consider moving Cumulative Effects section beginning on page 89 AFTER the specific resources.

f. Chapter 4: seriously consider placing the resources alphabetically; it would make it easier to find our interests. The current format is makes it tedious to locate resources.

g. Chapter 4: consider moving "Incomplete and Unavailable Information" to Chapter 3.

4. Analysis of impacts:

a. Instead of using text to state the effects, use graphics. "A picture is worth a thousand words" is applicable in this case too.

b. Use graphics to show costs to timberlands, fire suppression, grazing, recreation, wildlife, and threatened and endangered species.

5. Cumulative impacts: weeds spread geometrically and logarithmically, not linearly. The longer the delay to treat weeds, the higher the costs (to resources, as well as operation and maintenance costs).

6. Environmental Justice, page 293: Environmental justice is not limited to analysis of race and income. A case could be made that weed infestation disproportionately impacts ranchers (and those affected indirectly through the multiplier effect). One could say that you addressed ranchers by identifying the counties. But you did not "connect the dots". Why do certain counties have higher percentage living below the poverty line?

7. Page 294, last full paragraph states "While the percentage of the population living

below poverty was slightly greater east of the Cascades, its percentage of total population decreased by a greater degree than west of the Cascades." This is confusing.

a. Regarding the same sentence: with more people living below the poverty line east of the Cascades, the income in ranching dependent counties are linked not only to prices of livestock, fuel, and supplies. Net income is affected by the fact that weeds decrease the nutritional value and availability of pastures.

b. Effects to recreation: "watchable wildlife" tourism has increased incomes in many rural communities. Watchable wildlife could be affected by weed infestation (i.e. weed infestation affects available pasture thereby affecting the number of wildlife. Less wildlife could mean less tourism, hence less income for local communities.

DEIScomments_102709.doc

rec 10/28

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Sara Livingston 5135 Nectar Way Eugene OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(54)

rec. 10/28

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Donald R. Davis 4096 Hilyard Eugene, OR 97405-3959

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(55)

rec 10/28

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: David Rosenblatt 4096 Hilyard, Eugene OR, 97405-3959

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(95)

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

10/28 VCC

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: JOHN MCELASH 2109 LAWRENCE ST EUGENE OR 97405
ANNA BAIO

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

547

Public Comment on Draft Environmental Impact Statement on BLM Herbicides 26 Oct '09

Dear BLM, my name and address are: Chuck Mitchell
3820 Colony Oaks Dr.
Eugene OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

58

rec 10/28

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Debra Higbee, 4750 SW Nash, Corvallis, OR 97333

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools, on leased BLM lands, campgrounds, and picnic areas. Children before profits!

Debra Higbee

rec 10/28

(69)

News: Last Seven Days

Story posted to Web: Thursday, Oct 22, 2009 05:00PM

Guest Viewpoint

GUEST VIEWPOINT: Tell the BLM to stop using herbicides

By Day Owen

Appeared in print: **Thursday**, *Oct 22, 2009*

At the time the Bureau of Land Management conceived its Western Oregon Plans Revision proposal, plans were also made for the increase in pesticide use that would accompany the 300 percent increase in logging BLM forests. The WOPR, due to resistance from the public, is dead. Now our attention must turn to its sister: The Draft Environmental Impact Statement for Vegetation Treatments Using Herbicides on BLM Lands in Oregon. The comment period ends Dec. 1.

I just finished reading the 548-page draft EIS. It is the first BLM-authored document that I have read that acknowledges the very real dangers of herbicides to fish, wildlife and humans. Unfortunately, after acknowledging how dangerous the pesticides are, the agency goes on to propose a major increase in their use, including some particularly toxic ones!

On page 320, three of the new pesticides the BLM is proposing to begin using for the first time in Oregon are described as follows: "Bromacil, diuron, and tebuthiuron have the highest risks to some of the public. Diuron is a suspected carcinogen."

Besides adding new pesticides to the poison arsenal, the BLM plans to increase the use of an old one — the notorious 2,4-D, of which the agency writes: "2,4-D has possible endocrine disruption abilities ... Based on recent studies ... 2,4-D is toxic to the immune system and developing immune system, especially when used in combination with other herbicides (tank mixes)."

On page 91 the BLM acknowledges that the National Resources Defense Council has petitioned the Environmental Protection Agency to revoke all registrations of 2,4-D due to its neurotoxicity, endocrine disruption effects, mutagenic effect, dermal absorption rate increases in people who drink alcohol or use sunscreen, and its presence in breast milk.

And the BLM wants to increase its use? Tell the BLM: "We want zero use of 2,4-D in our forests!" The address: Vegetation Treatments EIS Team, P.O. Box 2965, Portland, OR 97208.

Although the BLM asserts that some of the new herbicides are less dangerous than some of the four to which the agency is currently limited, the quotation about "recent studies" revealing previously unknown problems with 2,4-D illustrates the fact that many pesticides are in use for decades before their true toxicity comes to light. In the past few months, studies have revealed that glyphosate and atrazine, for decades trumpeted as relatively harmless to humans, are in fact far more detrimental than long believed.

On page 188 we read about the impact of this plan to fish: "Herbicides could enter water bodies and come into contact with fish or elements of the food chain on which they depend through drift, runoff, leaching, wind transport, accidental spills, and direct spraying. Potential impacts include mortality, reduced productivity, abnormal growth, and alteration of critical habitat..."

Five alternatives are listed, No. 4 being the BLM's preferred option. Alternative 1 is: No herbicides. Alternative 2: Take no action (the BLM would continue to use the just four herbicides currently permitted by a 1984-1987 court injunction). Alternatives 3, 4 and 5 all increase the numbers of herbicides to be used by the BLM, but differ in regard to important details such as the amount and location of aerial spraying.

It is important to note that a huge difference between the BLM "Preferred Alternative 4" and keeping the status quo (Alternative 2) is that the new plan would permit spraying to kill "any vegetation" instead of the current limitation to "noxious weeds." It would also permit the agency to begin spraying schools, campgrounds and picnic areas. Children are more susceptible to pesticides. Do your children picnic or camp?

The biggest difference between Alternative 2 and Alternative 4 is that No. 2 can't really be selected! It and Alternative 1 — No herbicides — are included only for "comparison purposes." But the BLM adds in regard to Alternative 1: "... it is conceivable for a variety of legal, social ... reasons that it might be selected, at least in localized areas."

Most troubling is the BLM admission that it was hampered in its effort to do a proper risk assessment on the pesticides it wants to use because of a law that permits pesticide makers to conceal the identity of the inert ingredients. It is known that the inert ingredients are often more toxic than the listed ingredients. The pesticide makers conceal the inert ingredients from scrutiny by calling them "trade secrets."

The pesticide makers will profit most from this increase in pesticide use. This plan can be traced back to them, as Pitchfork Rebellion will detail at our Rally to Stop the BLM Poison Plan to be held at 1 p.m. Saturday, Oct. 31, at the old federal building in Eugene.

Day Owen co-founded Pitchfork Rebellion (pitchforkrebellion.com, or P.O. Box 160, Greenleaf, OR 97430).

Go Back

(61)

All brush-fighting carries risks

Federal Environmental Impact Statements, as quoted by Day Owen (guest viewpoint, Oct. 22), need to note even hypothetical risks of any federal action. Agencies do not need to provide comparative risks of various ways of doing what they must do, nor net benefits. There is often a huge risk just from delaying needed action while drafting the EIS and getting it through review and court challenges. There is high risk of high cost in administration while delaying the required job. There is high risk that the delay of treatment will make pest problems become pandemic, as in insects or certain noxious weeds. Delay in treating weeds is a great example of losses from tree mortality when not free of weeds. Owen talks about toxic herbicides frivolously, as if the range of toxicity were way off the charts. But many foods have natural toxins far more poisonous than herbicides — but as with herbicides, concentrations are low and exposure is almost meaningless. These chemicals do not move off sites where they have landed, and contaminate water at a minuscule level when applied directly in experiments. Fish do not accumulate them because even when there are traces in water, the exposure time and level of exposure are too small to be detectable.

Owen needs to explain to folks that cutting brush with a chainsaw is very dangerous business, involving bee stings, poison oak, cuts and exhaust fumes, to say nothing of back sprains and blown knees. I'm glad Owen is not my doctor.

MICHAEL NEWTON
Philomath

10/25

(62)

Support no-herbicide spray plan

After reading Day Owen's Oct. 22 guest viewpoint on the Bureau of Land Management's proposed vegetation treatment plan, I went to the BLM Web site and read its draft environmental impact summary for myself. While it was fairly specific on what the agency wanted to do with dangers such as sudden oak death in southwest Oregon and imperiled sagebrush habitat in rangelike settings, it was unclear on what it had in mind for our little corner of the world.

My limited knowledge of that world, from living in the foothills of the Coast Range the last few years, starts with logging trucks speeding by my home on Highway 36 every 15 minutes. The clear-cutted mess due west is the quandary the BLM finds itself in whenever the agency tries to replant delicate Douglas fir seedlings amidst such wasteland.

Is that scenario mentioned under any of the BLM's five proposed vegetation plans? Not that I could find. It's a no-brainer, though, that its preferred alternative No. 4 would spray toxic chemicals from helicopters flying over schools, parks, homes, gardens, rivers, fields in an attempt to get those seedlings well-grounded and weed-free. That isn't an option we can live with.

For its profound vagueness as worded in the EIS, and its potential danger, I urge Lane County residents to reject alternative No. 4 and write the BLM in support of alternative No. 1 — a no herbicide spraying plan for our community.

BOB BERMAN
Cheshire

10/27

(63)

10-26-09

rec 10/28

B.L.M.,

Please - we want zero use of 2,4-D in our forests!

In my family alone - we already have at least 3 "canaries" in regards to herbicides. Our bodies can not handle the processing of chemicals - due to enzyme impairments in the liver... - so chemicals like this even further compromise our health.

Neurotoxins are endocrine disruptors - we moved to Oregon to try to live as chemically free as possible. Please use the least health impairing products.

Marianne Zundel
Ride Zundel
Ahna Zundel

25160 Jefferson St.
Eugene OR
97405

(64)

rec 10/28

PUBLIC COMMENT ON DRAFT ENVIRONMENTAL IMPACE STATEMENT ON BLM HERBICIDES

October 27, 2009

from:
Lillian DeSoto
PO Box 922
82564 Sprague Lane
Pleasant Hill, Oregon 97455

Dear BLM,

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE - no herbicides - because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your **DEIS** did not include an analysis of the inert ingredident and relied on a Bush-Administration legal definition of the term "drift" that eliminated the considertation of vapor as drift.

I protest that you pretent to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four' would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation" including at schools on leased BLMl lands, campgrounds, and picnic areas. Children before profits.

Use these same budget cost to create the manual labor jobs.

Sincerely,

Lillian DeSoto

(65)

rec 10/28

PUBLIC COMMENT ON DRAFT ENVIRONMENTAL IMPACE STATEMENT ON BLM HERBICIDES

October 27, 2009

from:
Manual Soto
31679 Lynx Hollow Road
Cresswell, Oregon 97426

Dear BLM,

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE - no herbicides - because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your **DEIS** did not include an analysis of the inert ingredient and relied on a Bush-Administration legal definition of the term "drift" that eliminated the considertation of vapor as drift.

I protest that you pretent to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four' would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation" including at schools on leased BLMl lands, campgrounds, and picnic areas. Children before profits.

Use these same budget cost to create manual labor jobs.

Sincerely,

Manual Soto

Manual Soto

(66)

rec 10/28

PUBLIC COMMENT ON DRAFT ENVIRONMENTAL IMPACE STATEMENT ON BLM HERBICIDES

October 27, 2009

from:
ReggieDeSoto
PO Box 922
82564 Sprague Lane
Pleasant Hill, Oregon 97455

Dear BLM,

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE - no herbicides - because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your **DEIS** did not include an analysis of the inert ingredient and relied on a Bush-Administration legal definition of the term "drift" that eliminated the considertation of vapor as drift.

I protest that you pretent to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four' would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation" including at schools on leased BLMl lands, campgrounds, and picnic areas. Children before profits.

Use these same budget cost to create the manual labor jobs.

Sincerely,

Reggie DeSoto

(67)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Carol McBrien 1875 W. 15th Ave Eugene OR 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

rec 10/28

rec 10/28

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Joshua Welch, 1995 Grant St, Eugene OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(8)

(69)

rec 10/28

Vegetation Management EIS Team
Box 2965
Portland, OR 97208-2965

Re: Comments to the DEIS, October 16, 2009

You have asked for comments regarding
A) Whether the DEIS has an appropriate range reasonable alternatives, and
B) Whether the analysis of effects is complete and appropriately presented.

A) I believe you have an appropriate range when you restrict the scope to control of "noxious weed, invasive plant, and other non-commodity vegetation management programs". I would have like to have seen the inclusion of commodity vegetation management as well, which would include silviculture for timber production.

The basis for this would be your direction under the O&C Lands Act of 1937, which in part states:

"...shall be managed, except as provided in section 3 hereof, for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities: ..."

Since herbicides have been shown to be a safe, effective, legal and cost-effective silvicultural tool, and BLM has difficulty in reforesting some sites especially after wildfire, I believe that herbicides should have been considered for this purpose in the DEIS, at least for the O&C lands.

B) I believe you have done a thorough job in your analysis, and presented it well.

I support the preferred alternative of all those presented. I have worked in silviculture in southern Oregon for over 30 years, mostly on private lands, and know from this experience that there is no hope of controlling or slowing invasives without herbicides. The addition of other registered herbicides to the four you currently have will help.

I believe that invasive plants pose a bigger threat to properly functioning native ecosystems than fire, insects, logging, volcanos, roadbuilding, grazing or earthquakes, since the whole dynamic is permanently changed.

Sincerely,

Michael S. Meredith

(70)

Pitchfork Rebellion presents:
A legal, peaceful rally to save our forests!

STOP THE BLM PESTICIDE INCREASE

Featuring a MOCK TRIAL in the Case of Mother Nature versus the BLM!

Saturday, October 31, 1 p.m.

Rain or shine! It's Halloween Day! You are Encouraged to Wear a Costume!

With Free Concert by:
Ian Van Ornum's Blue Grass Band, Mossy Top
(Ian is the teen who got tased but his singing was already electrifying!)

and Eugene's Favorite Reggae band,
I-Chelle and the Circle of Light

Day Owen speech:
"Stop Poisoning Us for Profit: Big Pesticide and the BLM!"

Maya Gee speech:
"The Hidden Truth about Invasives:
What Big Pesticide Does Not Want You to Know!"

WHERE:
The Old Federal Building at: 211 E. 7th Ave, Eugene
(by City Hall)

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

106 MARLBORO LN
EUGENE OR. 97405

Dear BLM, my name and address are: WILSON L. MACKENZIE

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE (no herbicides) because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your "Proposed Option, Alternative Four", would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

PUBLIC COMMENT PERIOD ENDS DECEMBER 1ST 2009

Mushroom Friends:
Act Now to Stop the BLM from Poisoning Wild Mushrooms and the Entire Forest Ecosystem!

Do you enjoy picking wild mushrooms? Do you love Mother Nature and our beautiful forests where we pick?

THE BUREAU OF LAND MANAGEMENT (BLM) PLANS TO POISON OUR MUSHROOM HUNTING SITES (OUR PUBLIC FORESTS THAT THEY MANAGE) WITH A HUGE INCREASE IN THE SPRAYING OF POISONS (PESTICIDES/HERBICIDES).

PESTICIDES ARE CARCINOGENIC TOXINS THAT HAVE NO HEALTHY PLACE ON OUR SOILS, AIR AND WATER – or bodies!

DID YOU KNOW THAT MANY EDIBLE AND MEDICINAL MUSHROOMS CAN ABSORB THE TOXINS FROM THEIR ENVIRONMENT?

Read the reverse side of this flyer to learn about a rally that we are staging to put a stop to the BLM plan to increase their use of pesticides in our forests.

At the bottom of the reverse side is a coupon that you can fill out and mail to the BLM before the PUBLIC COMMENT PERIOD ENDS ON DECEMBER 1. The details about this pesticide increase are found on that coupon, so, be sure to read it and mail it to the BLM (their address is provided directly above the coupon).

Hope to see you at the rally on Saturday October 31, Halloween Day at 1 p.m. Full details on the reverse!

For more info on the topic of the Big Pesticide lies about invasive plants: WWW.DRTHEO.ORG

For more info on the evils of pesticide: WWW.PESTICIDE.ORG

For more info on the fight to change pesticide laws in Oregon: www.pitchforkrebellion.com

rec 10/28

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jennifer L Rivas POB 71 Monroe OR 97456

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(17)

(72)

rec 10/29

VEGETATION TREATMENTS EIS TEAM
ATTN EDWARD W SHEPARD-OREG/WASH STATE DIR.
TODD THOMPSON-RESTORATION COORDINATOR
BLM
PO BOX 2965
PORTLAND OR 97208-2965

10/26/09

To Whom It May Concern:

Please accept my comments on the DEIS for Vegetation Treatments Using Herbicides on BLM lands in Oregon.

I. REQUEST FOR EXTENSION

The date on this document is Sept 11/2009 with a due date for comments on Nov 10, 2009. However, I and others did not receive the document until the first week in October. I do not know how many people this affected but for all practical purposes the comment period for me and others is 30 days-not enough time to complete adequate comments. I request an extension of 30 days.

II. PURPOSE AND NEED

Although I acknowledge that there is a problem with invasive plants and noxious weeds, the treatment proposed in this document could be more problematic for humans(especially recreational BLM land users), fish, wildlife, grazing animals, soils, water and the ecosystem in general. Cost cutting is a consideration, but not when it comes at the expense of potential human health risks and other dangers that these chemicals could cause when used on the proposed scale. We have only to view the historical record to see why the NCAP court case was brought in 1984.

I am an organic gardener and a BLM neighbor. I do not want my property nor the creek that runs through it subjected to these chemicals again. Even though commodity use is not proposed in this document, what is proposed has potentially far reaching consequences.

III. ALTERNATIVES

I am in favor of a "No Action" Alternative with the exception of targeting Tan Oak to prevent Sudden Oak Death. The effectiveness of this treatment in the long term might be questionable but as much as possible should be done quickly to eliminate diseased plants. Although the case can be made for targeting other plants, this is the only use that is critical enough at this time for taking this action. The reason for this is that introducing these chemicals into the environment again opens up a whole new potential hazard area that negates the ease and lower cost of herbicide use.

d. Pets 2,4-D is linked with Bladder Cancer and testicular problems in dogs.

e. Persistence and Contamination

(1) USGS surveys show persistence in agricultural and urban areas, in streams and rivers, and to a lesser extent in wells.

(2) People Centers for Disease Control found that about 25% of Americans carry this chemical in their bodies. Levels are higher in children

(3) Air USGS found that 60% of air samples collected had this chemical on a national level.

(4) Drift Drift problems show this chemical to be one of the top five pesticides involved in drift incidents over 26 states.

(5) Dioxin This is a deadly persistent contaminant in 2,4-D.

f. On pg 91 of the document references the Petition by NRDC to cancel 2,4,-D registration, and says that BLM will comply with whatever decision is made. If there are any safety questions it should not be used at all.

Glyphosphate(Roundup/Rodeo)

This is currently the most popular chemical being used in agriculture and on suburban landscapes. Studies have shown this chemical to be:

a. Carcinogenic to humans in the form of Non-Hodgkins Lymphoma(see references)

b. Miscarriages in human females

c. Reduction of male reproductive capacity

d. Birds-This chemical effects the plants birds use for food and shelter

e. Fish-Disruption of Fish immune systems has been shown

g. Frogs/Amphibians Genetic damage and inhibited development has been shown

h. Persistence

(1) A regional study in the midwest showed that Glyphosphate applied in spring persisted into the fall harvest season.

(2) Contamination has been found in six streams in King County WA-an urban area.

Picloram

This chemical is very dangerous and was evaluated by the EPA in 1995. Bothe the Ecological Effects Branch and the Environmental Fate and Ground Water Branch of the EPA recommended that the use of this chemical not be continued. However, the EPA did not accept these recommendations.

The Journal of Pesticide Reform of Spring 1998 Vol. 18 #1 with peer reviewed literature referred for citation had this to say about the chemical.

"*In laboratory tests, Picloram causes damage to the liver, kidney and spleen. Other adverse effects observed in laboratory tests include embryo loss in pregnant rabbits, and testicular atrophy in male rats. The*

should never be targeted. In these areas, work should continue to be done by hand. This costs more but provides badly needed jobs for people.

E. **Streams and Wetlands-Risk to fish and other Aquatic life**

Many of our streams are listed as "Water Quality Limited". That means they are polluted to the extent that certain parameters such as TMDLs, dissolved O2 , water temperature etc., are not at levels that promote healthy fish populations. The cumulative use of herbicides over time(even if they dissipate after use as claimed) can not help but add to these problems. Pg 178, "Fate of Herbicides in Wetlands and Riparian areas" recognizes this possibility.

The risk to fish by 2,4,-D is well documented. On pg 90 when discussing the NCAP Settlement Agreement, BLM makes the assumption that proposed use of 2,4,-D, Diuron, and Trichlopr is not like to contribute to adverse effects in anadromous fish. BLM should not make this assumption before the studies are completed.

E. **Habitat Improvement and Restoration**

This was listed as one reason for the proposed action-pg 6.What is the target species for the habitat to be improved? Use of these chemicals will possibly make things worse for neo-tropical birds of several types whose southern habitat is also under stress. Frogs have also been shown to be susceptible to chemical contamination exhibiting deformities. (see info under C). Many animals depend on plants to survive. While non-native species are probably not the best for them, chemicals may have other deleterious effects that compound the problem..

1. Sagebrush Habitat was discussed at length concerning invasive grasses. Vast areas in Eastern Oregon are scheduled to receive heavy herbicide treatments and some will have aerial spraying which is subject to drift.

   Aerial spraying of these chemicals should not be used anywhere. Anything within range, including people will risk exposure to drift.

   These grasses also present a fire risk. Fire risk will be even more acute when they are standing dead.

   Cattle grazing are probably responsible for this ecosystem change. Unless the cows are removed, the problem will be reintroduced and will require continuous treatment.

F. **Fire Control**

Although this was not part of the scope of the DEIS-brushing, controlled burns, and thinning by hand are currently part of BLM'S fire control program. It was not clear how this program would be effected by Herbicide use. Would only noxious weeds be targeted or would herbicides be part of the general use? Dead weeds and brush, if not removed could contribute to rather than reduce fire risk. Brush that has been sprayed by

In my opinion, BLM should continue to move toward less chemical use, not more. Public education about the dangers of these chemicals needs to be more widespread so households will use them sparingly.

This completes my comments. Thank you for my consideration.

Sincerely,
Susan Delles

2801 Sykes Creek rd
Rogue River OR 97537

REFERENCES

Journal of Pesticide Reform/Journal of Northwest Coalition for Alternatives to Pesticides(NCAP)/PO Box 1393/Eugene/OR/97440
The following peer reviewed information is taken from this Journal and included under the following topics:

1. **2,4-D**
Winter 2005.Vol. 258. NO. 4 pg 16; also list of 2,4-D Inert Ingredients on pg 12

2. **Glyphosate**
Winter 2004. VOL. 24. NO.4 pg 15; also list of Glyphosate Inert Ingredients on pg 11

3. **Picloram**
Spring 1998. VOL. 18 NO. 1 pg 20; also see introduction to fact sheet on pg 13 quoted on pg 3 of this paper

4. **Oregon Department of Agriculture**
Pesticide Use Reporting System, 2008 Annual Report, June 2009

rec 10/29

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: William M. Gilbert 2382 Malabar Dr. Eugene OR 97403

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(73)

rec 10/29

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Paula Naas 850 Centennial Blvd., Springfield, OR 97477

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(47)

rec 10/29

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Blair Girard 990 W. 22nd Street, Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(47)

76

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Cynthia Biles 4125 Bluebelle Way Springfield OR 97478

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

rec 10/29

(47)

PUBLIC COMMENT P

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Vera Moore, 443 Brookside Dr. Eugene OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

rec 10/29

rec. 10/29

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: J. Robert Moore

J. Robert Moore
443 Brookside Dr.
Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

78

rec 10/29

Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Ann Hubbird 2489 Emerald St. Eugene OR 97403

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(99)

rec 10/29

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: JAMES CLARKSON 961 W. 5TH AVE #3 EUGENE, OR 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

rec 10/29

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Robert Elder, 3957 Potter Street, Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(81)

rec 10/29

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: David Wilcoxen, 1500 McKenzie Rd. #52 Eugene, OR. 97401

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(82)

rec 10/30

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Ms. Carol Cesaletti
3065 Potter St.
Eugene, OR 97405-4235

Dear BLM, my name and address are: _____

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

83

vec 10/30

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: William Rankin / 914 A Street, Springfield, OR 97477

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(87)

VLC 10/30

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Susan M Rankin, 914 N "A" St, Springfield, OR 97477

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(85)

(86)

Govt Letter
also incl. in Ed briefing package. KEO

Master
11/10 KEO
No substantive comments

tbeard@co.marion.or.us
10/30/2009 09:58 AM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Tanya Beard

Requestor: Tanya Beard
E-mail address: tbeard@co.marion.or.us

Comments:
BLM Draft EIS comments

28 October 2009

Tanya Beard

Environmental Specialist-Botanist

Marion County Public Works

Preference: Alternative 4

Upon reviewing the DEIS, I can safely say that the most helpful Alternative presented in this document is number 4. It addresses many areas of concern to both Marion County Public Works Noxious Weed program and the Marion County Weed Control District.

Points of interest:

The addition of the chosen herbicides will better address many of the county-listed noxious weed species which are no longer very responsive to the chemicals on the current acceptable list of use by the BLM in Oregon.

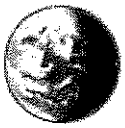
The addition of treatment options such as ROW treatment and treatment of poison oak in campgrounds (addressing human health hazards), also help to achieve overall goals within the county to maintain clear, safe transportation routes and recreation areas for county visitors and residents.

There are many benefits to disallowing the use of aerial herbicide applications. Marion County has the highest per capita agricultural production in the state, making protection of area crops paramount to the overall vitality and economic success of the County. While some growers do employ aerial applications as part of their own regimes, it's important that the growers be allowed to make the decisions regarding what may or may not impact their crops, and avoid potential drift situations. Thus, Alternative 4 addresses the needs of cooperators here in Marion County most effectively.

The cost/benefit analysis of Alternative 4 indicates the highest return of all the Alternatives offered. As with anything, prevention is the best option. However, in the case of invasive species, many populations are already established and need to be controlled. By using Early Detection Rapid Response (EDRR) methodology in combination with integrated vegetation management (IVM) techniques, the BLM can minimize and target their chemical applications. Marion County utilizes and recommends the use of EDRR and IVM, and thus supports Alternative 4, as it employs both management techniques effectively and efficiently.

Properly following labels on all chemical applications, and/or using both caution and common sense when employing other methods of control for native and noxious species, manages any impact potential to water quality and habitat protection. This practice makes the need for mitigation extremely unlikely. Because BLM has performed their own risk assessments on the proposed herbicides, and because significant assessments have been performed independently under a variety of conditions, Marion County feels that the addition of the herbicides in Alternative 4 would be an asset to BLM's work. The County recognizes the risks inherent in herbicides and most other types of vegetation control, and also acknowledges that there are citizens with unique concerns. However, the County supports the use of all tools included in a proper functioning IVM program.

(87)



micheal sunanda
<michealspun@yahoo.com>
10/30/2009 07:44 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Prevent dangers of poison spraying in forests

Dear BLM

I am very concerned about the spraying of poisons on forests watershed to kill weeds or insects also damages the health of other organisms & know to hurt humans health. See NCAP - NW Coalition for Alternatives to Pesticides documents these toxic patterns for 30 years now. We need protection form dangerous chemical sprayed anywhere & our forests are sacred spaces of multi-diverse natural functions we respect with EcoForestry & need your support for protecting our privacy & happiness in & near forests your empowered to protect.
Naturallyours Micheal Sunanda Eugene, OR
It appears that the maker of forest chemical poison sprays has 'conflict of interest' there.

(88)

Linda Taylor
<bltindiamond@hotmail.com>

10/31/2009 09:30 AM

To <orvegtreatments@blm.gov>
cc
bcc
Subject

Because we know the noxious weed problem to be of critical concern we are definitly in favor of using additional herbicide products.

Buck and Linda Taylor

rec 11/2

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Joey Barrote 1003 W 1st Ave Eugene, OR 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(89)

rec 11/2

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: JAIN ELLIOTT 1419 W 4TH EUGENE 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(10)

rec 11/2

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Pam Watts 44362 McKenzie Hwy Walterville

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(91)

rec 11/2

What Big Pesticide Does Not Want You to Know

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Désirée Paquette 98029 McKenzie Hwy Vida, OR. 97488

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

92

(93)

rec 11/2

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Sheila Lowe 1710 Northview Rd. Eugene 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

rec 11/2

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: John & Bonnie Marineau
380 Ventura Av – Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(94)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: DAVID IVAN PICCIONI 658 VAN BUREN ST EUGENE OR 97402

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(95)

I know that you have economic ties to the companies that sell pesticides/herbicides and cut the forests.
Do what is right for all of us not just so you can buy a newer or bigger house.
People before profits!

Dave Y. Piccioni

10/30/09

rec'd 11/2

rec 11/2

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Rand Herrick, 1133 Olive St. Apt. 616, Eugene, OR 97401

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

96

Fill Out the Following Coupon NOW and Mail it to BLM Before the Public Comment Period Ends!
Mail coupon to: Vegetation Treatments EIS Team, Box 2965, Portland, OR 97208

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Sara Burant 3059 Whitbeck Blvd. Eugene, OR 97405

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

97

2/11 021

(98)

rec 11/3

Notice of Verdict Against the BLM
in the Mock Trial Case of
Mother Earth Versus the BLM
held on October 31, 2009, at old US Courthouse

From: The Pitchfork Rebellion
Box 160, Greenleaf, OR 97412 email: greenlion@pitchforkrebellion.com
To: Bureau of Land Management

Dear Ginny Gilley of Eugene/Springfield Office of BLM:

We, *Pesticide Poisoning Victims United,* a Division of *The Pitchfork Rebellion,* hereby respectfully request that you forward copies of this communication to the following three offices, and that you take the other steps outlined in this letter. Those three offices are:
1) The Portland Office of Oregon BLM Director Ed Shepard;
2) The National Director of the BLM (we don't know the name of this person);
3) Ken Salazar, Director of the Department of the Interior.

This letter is to inform the BLM that on October 31, 2009, more than one hundred people braved heavy rain to attend an outdoor Mock Trial of the BLM. The trial was called *The Case of Mother Earth Versus the BLM* and featured testimony of persons dressed as various forest creatures as well as humans who have been poisoned by timber industry herbicides.

THIS TRIAL WAS IN RESPONSE TO THE CURRENT BLM DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR VEGETATION TREATMENTS USING HERBICIDES ON BLM LANDS IN OREGON, which is now in the public comment period scheduled to end December 1.

The trial included testimony on behalf of BLM's 'Preferred Alternative Number Four' by a mock BLM spokesperson. Standing behind and above that spokesperson on a ladder was a puppeteer with strings attached to the BLM spokesperson. That puppeteer was labled "Big Pesticide" to make the point that the entire "war on invasives" that has resulted in the current BLM plan to increase use of pesticides in Oregon is, as trial testimony well demonstrated, truly a money-making gimmick hatched by Big Pesticide, especially Monsanto. For example, the origin of the BLM's current war on invasive plants can be demonstrated to be the Council on Invasive Species that came into existence by Presidential Executive Order 13112. Trial evidence demonstrated that though the Executive Order was issued by President Clinton, it was essentially written by Monsanto lobbyists. Further, the point man within the administration who brokered the negotiations between Clinton and Monsanto was Secretary of Commerce Mickey Kantor, who, after leaving office, was placed on the Board of Directors of Monsanto. From the time of the issuing of Presidential Executive Order 13112 until the present, the council established by that order – The Council on Invasive Species – has served the interests of Big Pesticide, including providing the gloss of scientific credibility to a pseudoscience called "Invasion Biology." Further supporting data and findings available upon request: greenlion@pitchforkrebellion.com

It is the finding of this Mock Trial Court as affirmed by the attached signatures of the twelve chief jurors to the penalty statement on the following page, **that the BLM should require that their scientists read the book,** *Invasion Biology: Critique of a Pseudoscience,* by David Theodoropoulos.
One copy of that book will be delivered to the office of the Eugene/Springfield BLM by Pitchfork Rebellion Trick-or-Treaters in garb of forest creatures on Monday, November 1, at 3 pm, along with this letter.

We hereby request that Ginny Gilley inform the other recipients of this letter that the BLM's stated (in summary of DEIS) "conceivable" reason that Alternative One – no herbicides – "might be chosen at least in some regions" (i.e. "political" or "social" reasons) has been achieved in Lane County by virtue of the well-attended mock trial that has been described in this letter. **We ask Ms Gilley to meet with us in that regard.**

rec 11/3

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: KATIA JIMENEZ 4096 E 17TH AVE, EUGENE OR 97403

I oppose your plan to increase use of pesticides. I support ALTERNATIVE ONE – no herbicides – because all of the other alternatives would increase the use of pesticides, including the deadly 2,4-D and the carcinogenic Diuron.

I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as drift.

I protest that you pretend to offer five alternatives but admit that numbers one and two are "only for comparison."

I object to the fact that your 'Proposed Option, Alternative Four', would change your current authority "to spray only noxious weeds" to have new legal authority to "spray all vegetation", including at schools on leased BLM lands, campgrounds, and picnic areas. Children before profits!

(1)