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: Noal Delgado 3489 Willamette 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!

(539)

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Aubrey Baner 1475 East 15th St. University of Oregon

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Marvin Davis 1127 Valhalla

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Linda Bumpas, 4405 Dillard Rd, 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.

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541

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Justin McBurnett 4105 Fox Hollow Rd. 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Marian Weissman 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: TERRY BEQUETTE 2730 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.

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(54)

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Debra Connolly 76454 Hazel St. Oakridge 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Arthur Ellis, 1678 Villard 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: ROGER RABB 50 W. 31st 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.

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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: Nikolaus Kamrath 1911 Onyx St. 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.

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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: Ruby Irish 3295 Cross St, Eug 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.

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549

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jason Winkel 18443 Hwy 36 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Trinity Treat, 446 W. 17th Ave, 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Mike Silva 7099 Beaumont Drive Concord NH

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: T. Harrell P.O. Box 42506 Portland, OR 97242

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: John Spragens PO Box 3011 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jon Koebel 3380 Harris St. Eugene, OR 974

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jean Nelson 2731 University St Eug, OR 97403

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Karen Bankole 32535 Zarzamora Ln. Eugene OR 97405

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Peter James 2080 Riverview 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.

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Draft Environmental Impact Statement

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Yoshiko Ichinohe 2080 Riverview 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Janene L. Diaz 2790 Elinor st. Eug. OR 97403

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Linda Daugle - 2441 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Sarah Pagen 1300 Walker St #52
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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Thomas Kurzka, 2661 University 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: M. Dawn Kurzka 2661 University St. Eugene OR 97403

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: [illegible] 16 N Adams 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides #2

Dear BLM, my name and address are: Karen Mount 785 E 36th Ave 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Elizabeth G. West - 2132 Hope Ln, Redding CA

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.

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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!

568

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: David Norem 2907 Ingalls 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!

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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 [illegible]

Dear BLM, my name and address are: [illegible]

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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: LINDA HUNT 4250 KINCAID ST 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.

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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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: FRANC STRGAR
85250 McBeth 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Chloe Miller 2229 1/2 Kincaid St. 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.

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(573)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Gina Issac 2320 Hayes 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Susan Smith 7712 Thurston Rd Spfld 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Michael Carpenter

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: JED GRIFFIS 3777 ONYX 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Maria Ramos

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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Rachel Jordan, 285 E. 36th Ave. 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.

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---------- Charles Whitaker

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: PO Box 504 Veneta 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Alan Gillespie, 293 Rosewood, 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Dan Rasmussen, 2196 W 16th 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!

582

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: JOANN CARRABBIO & MARC ELLIOTT
1944 MOSS 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jeff DeWilde 77977 Cottage Grove Oregon 97424

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Rodney Fagundes 797 Howard 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Robert Blew 745 E 19th 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Manny 2360 Willamette St #2 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Priscilla Piper 1340 Mill St #102 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Amy Hack 2045 Willamette Apt #5 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Lori Ward 713 E 37th 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Hannah Nelson 719 E 17th 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Tayla Canales 725 E 17th Ave 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Max Smoot 1648 Alder st. 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Dana McGuire
88470 Fisher Rd.
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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: George, Wonder, Linda Eugene, OR 2625 Alder St 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Arthur Huebner
60 Madrona Ave
Cottage Grove, OR 97424

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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: RON ROGGENSACK, 452-C HOLBROOK LN, CRESWELL, OR 97426

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!

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597

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Kialing Perry 2740 Onyx 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!

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598

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: MIKE DRISCOLL / 3420 WOOD 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!

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599

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Nanette S. Bingaman-Schultz
755 E. 38th Ave #6 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!

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600

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Christine Brown 4930 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!

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601

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Rebecca McCann 1320 Lawrence Alley 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!

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(602)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Esther Jacobson-Tepfer
31700 Owl Rd
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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Renae Summerslee
1810 Crescent Ave. Klamath Falls, OR 97601

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!

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(604)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Twila J ~~Lot~~ Butler 2051 W. 14th P 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!

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605

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Kim Donahey 941 e. 22nd 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."

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606

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: FABIAN LAWRENCE 1760 SANDCREEK Rd Drain, OR 97435

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!

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607

CAMPBELL CLUB

Public Comment on Draft Environmental Impact Statement on BLM Herbicides 16th

Dear BLM, my name and address are: Nicole Hanson 1643 Alder St 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."

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Ruth Belcher 1648 Alder St. 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Sam Barchell 1350 Elkay D. 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Justus McCann, 1320 Lawrence Alley 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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Chuck Pinkerton P.O. Box 10793 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.

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612

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Blaine Cali 734 E 19th Ave. Eug. 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.

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(613)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Laura Thomas 32353 Eric Todd Ln Creswell OR 97426

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.

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(614)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: [signature] 947 N 56th Springfield, 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!

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Jennifer Schomp 161 W. 17th Ave. Apt. A 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.

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616

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Barbara Jenssen 2540 Potter Eug. 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.

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(617)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Barbara Kay Cooley, 2573 Potter 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!

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618

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Bruce Bayles, 686 E. 22nd 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!

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(619)

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Erin Grady 1670 Alder St. 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.

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620

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Josie McCurdy 770 Bailey Hill Rd 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.

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621

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Nancy Wolfson 2039 Harris St 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.

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622

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

2315 Mission Ave
Eugene, OR 97403

Dear BLM, my name and address are: Stan Washburn

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.

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Paula Ptacek 28722 Fox Hollow 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.

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624

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Maggie Appel 2635 Kincaid 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!

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

625

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: John LeMasurier 2441 Harris Pl. 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.

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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: Loreè Hoff P.O. Box 62, 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.

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629

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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: Kendra E Madden, 24084 Northam Rd. Elmira 97437 OR

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627

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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: Michelle Heff 1062 Main St, #4, Springfield, OR 97477

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628

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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 Rhonda Cullaine OR 1690 McKinley Street 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.

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629

(630)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RE: Herbicide Spraying on Public Lands

Dear BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program, and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM's proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

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Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM's proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Philip T. Powell

Philip T. Powell
258 A St. BMB 145
Ashland, OR - 97520-

(531)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RE: Herbicide Spraying on Public Lands

Dear BLM,

RECEIVED
NOV 23 2009

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Sincerely,

David Chasmar

Gardencraft
David A. Chasmar
468 N. Laurel St.
Ashland, OR 97520

(632)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Ezra Severin

EZRA SEVERIN
145 Central Ave Ashland

633

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

R.W. Corrigan

R.W. CORRIGAN
481 N MOUNTAIN AVE
ASHLAND, OR. 97520

639

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RECEIVED
NOV 23 2003

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Sincerely,

STEPHEN FRAZIER
720 N. LAUREL
ASHLAND, OR

(655)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RECEIVED
NOV 13 2008

RE: Herbicide Spraying on Public Lands

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Sincerely,

KENERLY
470 N. LAUREL
ASHLAND, OR 97520

636

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Paula Skuratowicz

PAULA SKURATOWICZ
2124 CREEK DR.
ASHLAND, OR 97520

637

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Carol Carlson

CAROL CARLSON
509 N MOUNTAIN AVE
ASHLAND OR 97520

(638)

Lucinda & Benjamin Kolo-Caron
449 Park Ridge Place
Ashland, OR 97520

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RE: Herbicide Spraying on Public Lands

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639

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Toni Lovaglia

Toni Lovaglia
473 Park Ridge Pl.
Ashland, OR 97520-1695

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Dan Schmidt
442 Thimbleberry Ln
Ashland OR 97520

(641)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Charles Brant

451 Williamson
Ashland 97520

(842)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

2124 CREEK DR.
ASHLAND, OR 97520

Victor F. Skuratowicz

VICTOR F. SKURATOWICZ

643

RECEIVED
NOV 23 2015

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Jacqueline Milikien

JACQUELINE MILIKIEN
609 OAK KNOLL DR
ASHLAND OR 97520-3735

644

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

John Hawksley
1230 Ashland Mine Rd
Ashland OR 97520

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RECEIVED
NOV 26 2008

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Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Susan Hackley
1230 Ashland Mine Rd, Ashland

(646)

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

RE: Herbicide Spraying on Public Lands

Dear BLM,

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Sincerely,

Jay Treiger
1950 Ashland Mine Rd
Ashland, OR 97520

(647)

RECEIVED
NOV 23 2015

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Abigail Lewis

ABIGAIL LEWIS
1210 Ashland Mine Rd 97520

(648)

RECEIVED
NOV 23 2009

Vegetation Treatments EIS Team
PO Box 2965, Portland, OR 97208
orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Michael L. Mollo 1210 Ashland Mine Rd (97520)

649

John Galloway
<john@johngalloway.net>

11/23/2009 03:42 PM

Please respond to john@johngalloway.net

To orvegtreatments@blm.gov
cc
bcc
Subject Protect Our Watershed and Do Not Expose Us to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

John Galloway

1223 NE 58th Ave, Portland, OR 97213
,

(650)

Stephen Whitlock
<stevegba@aol.com>
11/23/2009 04:04 PM
Please respond to
stevegba@aol.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Stephen Whitlock

,

(651)

Nov. 3, 2009

1879 Moss St.
Eugene, OR 97403

Vegetation Treatments EIS Team
P.O. Box 2965
Portland, OR 97208

Dear EIS Team,

As the BLM transition from its past of resource extraction of mature timber to a more sustainable harvest model, increased pesticide use is inappropriate. I urge you to reject Proposed Alternative 4, and offer a viable alternative that does not increase pesticide use on Public Lands. Until that point, I support alternative 1.

I know private home owners who reside in the Oregon Coast Range who suffer from herbicide exposure by private timber owners and your organization they are suffering from negative health conditions related to the chemicals you use. Their property values are reduced, and they feel unheard by the B.L.M. Your EIS plays only lip service to effective alternatives to reducing noxious weeds. With Unemployment so high, it would be beneficial to get people out into the woods weeding. It could be like a WPA project. Since most of the spreading of noxious weeds into BLM lands is from logging, roading, and commercial extraction, those activities should be rethought.

Finally, your elimination of "vapor" as a

drift exposure to adjacent lands is unfair and appears as a loophole to not be responsible for herbicide pollution.

I again urge you to reduce herbicide use and protect fish, wildlife, and the public. If the Northwest Forest Plan attempts to return the lands you have exploited to a more healthy state, you cannot increase such a harmful tool like herbicides (2,4-D and Diuron.) Please choose Alternative 1.

Please contact me with any questions.

Peter Saraceno
1879 Moss St.
Eugene, OR 97403
Saraceno_p@4j.lane.edu

(652)

Clint D. Weaver
644 Bergman Road
Nyssa, OR 97913

RECEIVED
NOV 23 2009

November 3, 2009

U.S. Department of the Interior
Bureau of Land Management
Vegetation Treatment EIS
P.O. Box 2965
Portland, OR 97208

Re: Support of Alternative 4 – Treatment of Noxious Weeds in Eastern Oregon

To whom it may concern:

This letter is being written **in support** of Alternative 4 of the Vegetation Treatments Draft EIS that would make available 12 herbicides west of the Cascades and 16 herbicides east of the Cascades to help control noxious weeks on BLM lands in Oregon.

Living and working in Eastern Oregon, as well as being an avid hunter and outdoorsman, I am happy to hear that the BLM is proposing proactive measures to control the spread of noxious weeds on BLM lands in Oregon. I have seen firsthand the incursion of noxious weeds that have overtaken native plants and increased the risk of wildfire. We hope that in Oregon the BLM will revise its practice to include all of the herbicides currently utilized by the rest of the Bureau in other western states.

Regards,

Clint Weaver

/kcp

cc: Kenny McDaniel, District Manager
BLM – Burns District Office
28910 Hwy 20 West
Hines, OR 97738

Dear BLM Representatives;

Enclosed is the work many volunteer citizens that strongly disagree with any and all proposed increases in poisonous herbicides in or environment and specifically on our Public Lands. The people have spoken and included in this packet are a recorded and documented One Hundred and Eleven (111) individuals that have taken the time read and sign their names and addresses. We expect that this single mailing will be counted as one hundred and eleven individuals opposing any and all proposed DEIS increases in herbicide use. We will be confirming that these have been recorded as that when we as citizens request the copy of the public comments from BLM.
We are also requesting to have short public comment period be extended for another sixty days so that the thousands of other concerned citizens can have their voice heard regarding the DEIS. Thank you

Dan/Maya Gee

Reply Forward

PHYLLIS CRIBBY.

654

exorbitant. To the degree a toxic substance is known to pose a significant human or ecological risk, the BLM has undertaken analysis to assess its impacts through risk assessments.

When evaluating risks from the use of herbicides proposed in a NEPA planning document, reliance on EPA's pesticide registration process as the sole demonstration of safety is insufficient. The U.S. Forest Service and Bureau of Land Management were involved in court cases in the early 1980's that specifically addressed this question (principally Save Our Ecosystems v. Clark, 747 F.2d 1240, 1248 (9th Cir. 1984) and Southern Oregon Citizens v. Clark, 720 F. 2d 1475, 1480 (9th Cir. 1983)). These court decisions and others affirmed that although the BLM can use EPA toxicology data, it is still required to do an independent assessment of the safety of pesticides rather than relying on Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) registration alone. The Courts have also found that FIFRA does not require the same examination of impacts that the BLM is required to undertake under NEPA. Further, risk assessments consider data collected from both published scientific literature and data submitted to EPA to support FIFRA product registration, whereas EPA utilizes the latter data only. The EPA also considers many wildland pesticide uses to be minor. Thus, the project-specific application rates, spectrum of target and non-target organisms, and specialized exposure scenarios evaluated by the BLM are frequently not evaluated by EPA in its generalized registration assessments.

The risk assessments are the source for much of the individual herbicide information presented in each of the effects sections in the EIS, including the high-moderate-low risk ratings shown in tables at the end of Chapter 3 and referenced in Chapter 4. Risk assessment worksheets have been, or are being, developed for each herbicide, to assist field managers in translating risks to project design parameters. The use of those worksheets is explained in Chapter 3, *Use of ERA Worksheets During Implementation.*

The component parts of the various risk assessments, and their origins, are shown on Table A8-1. Each part is available on the web via http://www.blm.gov/or/plans/vegtreatmentseis/riskassessments/index.php. At this address, each of the "X"s in the table are clickable links that access the respective section. The additional risk assessment information shown on Table A8-2 can be accesses at the above website as well.

Phone call to Todd Thompson

Phyllis Cribby
3350 SE 179th
Portland OR 97236

655

Travis Marshall
<travis_e_marshall@mac.com
>

11/23/2009 04:30 PM

Please respond to
travis_e_marshall@mac.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

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Sincerely,

Travis Marshall

8555 N Richmond Ave
,

656

Anthony Barreiro
<anthonybarreiro @yahoo.com
>
11/23/2009 04:30 PM
Please respond to
anthonybarreiro@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please fight weeds without using herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Anthony Barreiro

P.O. Box 40537, San Francisco, CA 94140-0537
,

(657)

brian busta
<flameon@pacbell.net>
11/23/2009 05:28 PM
Please respond to
flameon@pacbell.net

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

brian busta

,

658

Chad Adams
<chad.s.adams@gmail.com>

11/23/2009 04:51 PM

Please respond to
chad.s.adams@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Chad Adams

Chad Adams

3232 SE 8th Avenue, Portland, OR 97202

659

Draco Ferguson
<dracotanpdx@gmail.com>
11/23/2009 05:52 PM
Please respond to
dracotanpdx@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Draco Ferguson

Portland, OR
,

660

Garrett Slusky
<Kajgoldenstar @yahoo.com>

11/23/2009 10:32 PM

Please respond to
Kajgoldenstar@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Garrett Slusky

,

6061

Heron Saline
<heron3@mindspring.com>

11/23/2009 05:18 PM

Please respond to
heron3@mindspring.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Heron Saline

,

662

Jason Jandl
<jjpdx35@gmail.com>
11/23/2009 09:40 PM
Please respond to
jjpdx35@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Jason Jandl

Jason Jandl

PDX, OR 97214
,

663

Jason Lloyd
<lloydj@rocketmail.com>
11/23/2009 05:29 PM
Please respond to
lloydj@rocketmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Jason Lloyd

(664)

Jerome Cronin
<heartshearth @hotmail.com>

11/23/2009 06:02 PM

Please respond to heartshearth@hotmail.com

To orvegtreatments@blm.gov

cc

bcc

Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

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Sincerely,

Jerome Cronin

,

6665

Joe Hill
<plumcaravan@hotmail.com>
11/23/2009 06:14 PM
Please respond to
plumcaravan@hotmail.com

To orvegtreatments@blm.gov
cc
bcc
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Sincerely,

Joe Hill

,

6666

Joseph Ereneta
<phunkboy@riseup.net>
11/23/2009 05:37 PM
Please respond to
phunkboy@riseup.net

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

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PO Box 2965
Portland, OR 97208

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ed_shepard@blm.gov

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Sincerely,

Joseph Ereneta

4525?Lower?Wolf?Creek?Road?Wolf?Creek?OR
,

(667)

Mohabee Serrano
<mohabee@gmail.com>
11/23/2009 11:11 PM
Please respond to
mohabee@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

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PO Box 2965
Portland, OR 97208

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ed_shepard@blm.gov

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Sincerely,

Mohabee Serrano

(668)

peter little
<peterclittle @msn.com>
11/23/2009 05:22 PM
Please respond to
peterclittle@msn.com

To orvegtreatments@blm.gov
cc
bcc
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Portland, OR 97208

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ed_shepard@blm.gov

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Sincerely,

peter little

14 lake attitash
,

669

Robert Spragins
<VANLINGTON@HOTMAIL.COM>

11/23/2009 10:41 PM

Please respond to VANLINGTON@HOTMAIL.COM

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Robert Spragins

730 14th St.
,

(670)

steven baratz
<sbaratz@mindspring.com>

11/23/2009 08:14 PM

Please respond to
sbaratz@mindspring.com

To orvegtreatments@blm.gov

cc

bcc

Subject Please Do Not Expose Me to Toxic Herbicides

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Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

steven baratz

,

671

Steven Schultz
<sms.slp@gmail.com>
11/23/2009 05:47 PM
Please respond to
sms.slp@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
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orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Steven Schultz

,

(672)

Thomas Thacker
<tthacker@spiritone.com>

11/23/2009 10:15 PM

Please respond to
tthacker@spiritone.com

To orvegtreatments@blm.gov

cc

bcc

Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Thomas Thacker

6336 N Burrage Ave, PTLD, OR 97217

(673)

Russ Yttri
<ybaynedog33@aol.com>
11/24/2009 07:58 AM
Please respond to
ybaynedog33@aol.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

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PO Box 2965
Portland, OR 97208

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ed_shepard@blm.gov

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Sincerely,

Russ Yttri

hudson wi
,

(674)

Ray Hudson
<uniformscout@gmail.com>

11/24/2009 09:33 AM

Please respond to uniformscout@gmail.com

To orvegtreatments@blm.gov

cc

bcc

Subject Please Do Not Expose Me to Toxic Herbicides

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PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Ray Hudson

(675)

Keith Chisholm
<kacfriendster@yahoo.com>
11/24/2009 12:41 AM
Please respond to
kacfriendster@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

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orvegtreatments@blm.gov
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Sincerely,

Keith Chisholm

1555A Sacramento Street, San Francisco, CA 94109
,

676

Julia Burwell
<jules0342@msn.com>
11/24/2009 03:18 AM
Please respond to
jules0342@msn.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Julia Burwell

(677)

Jim Oxyer
<kylthrfaerie @insightbb .com>
11/24/2009 02:46 AM
Please respond to
kylthrfaerie@insightbb.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

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ed_shepard@blm.gov

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Jim Oxyer

1210 S Brook St Unit 1
,

(678)

dean hibbs
<djourney148@yahoo.com>
11/24/2009 08:24 AM
Please respond to
djourney148@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

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dean hibbs

2135 west 12th apt 1
,

(679)

David Horste
<davidleosunshine @gmail.com>
11/23/2009 05:54 PM
Please respond to davidleosunshine@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject I'm Against Toxic Herbicides in Wolf Creek Forests...

To whom it may concern: Although I live in Portland, I spend a lot of my time and money in the forests around Wolf Creek and it is a place of deep importance for me and my family. I support the writers of the letter below! May I suggest a community project using goats to control the undergrowth and the practice of sustainable, organic, forestry?

Thanks for your consideration,
David Horste
Portland, OR

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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(680)

JOHN GRAVES
<angeliclive@yahoo.com>
11/24/2009 08:48 AM
Please respond to
angeliclive@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

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PO Box 2965
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Sincerely,

John A Graves.

And since most of this letter is pregenerated I must say...HOw dare you poison our land! What makes you folks think you have the right to POISON our land and water??? It effects YOUR health too! Or maybe you dont live near there and dont care that you could get cancer, kill your immune system, or worse!

JOHN GRAVES

(681)

John McDonough
<john.mcdonough@rocketmail.com>
11/24/2009 08:48 AM
Please respond to john.mcdonough@rocketmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. Some of this land is land which is sacred to a large community of which I am a member and the central home of our church, the Church of Nomenus.

I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

John McDonough

,

(682)

"Kurt and Julia Munson "
<kurt.julia@verizon.net>

11/23/2009 08:06 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Comment on the Plan

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are:
Kurt R Munson
12205 SW Marion Street
Tigard, Oregon 97223

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! The safety of most of these chemicals has not been determined using modern analytical methods in double blind tests. Most of the safety literature has been developed by those most in a position to profit. The government has no business releasing these agents for widespread use when their effects are so poorly known.

(683)

Roddy Erickson
<rerickson@pobox.com>

11/23/2009 09:27 PM

Please respond to
rerickson@pobox.com

To orvegtreatments@blm.gov
cc
bcc
Subject Herbicide spraying in Wolf-Pup: Against

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Sirs,

I am alarmed that BLM proposes to increase its spraying of herbicides in the Wolf-Pup area. Our water supply - both spring and well - comes from one of the hillsides BLM proposes to log, and is likely to be affected by herbicides leaching into the groundwater. 2,4-D, in particular, would render the water supply unusable at a facility which gets hundreds of visitors in a year.

Please consider other methods to attack invasive weeds, and please avoid any use of these herbicides to support logging.

Roddy Erickson

Anacortes, WA 98221
,

(684)

Will Grant
<will@greyotter.com>
11/24/2009 02:30 AM
Please respond to
will@greyotter.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

Please respect life and stop spending public money to poison the Earth with deadly chemicals. The main value of these poisons is to line the pockets of the businesses that manufacture them for no purpose other than turning a profit for themselves without regard to human life or the life of the land and other animals.

Is broadcasting vile poisons over public land what you longed to do with your life when you were a little boy? I hope not! What an unhappy child you would have been.

Sincerely,

Will Grant

,

(685)

"T. Baer"
<teddybare@earthling.net>

11/23/2009 07:52 PM

Please respond to teddybare@earthling.net

To orvegtreatments@blm.gov
cc
bcc
Subject Don't Poison my Spiritual Sanctuary

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

To whom it may concern at the BLM.

The Wolf Creek Radical Faerie SANCTUARY (4525 Lower Wolf Creek Road in Wolf Creek Oregon) is my spiritual HOMELAND.

The water of the Sanctuary quenches my thirst as I retreat on this SACRED land.

It has come to my attention that you want trample my First Amendment Rights by POISONING the water supply of Spiritual Sanctuary by spraying toxic herbicides around it.

This is a FORMAL protest--one that I am requesting a response to. I am not poisoning you church. Please tell me why you would destroy mine?

Expecting your response,
T. Bare

T. Baer

,

(686)

Victoria Grace
<handyfae@sbcglobal.net>
11/24/2009 11:28 AM
Please respond to
handyfae@sbcglobal.net

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Ms. Victoria Grace, a constituent of the Nomenus Sanctuary at Wolf Creek, OR

Victoria Grace

,

(687)

Carol Carmick
<standing.wave@gmail.com>
11/24/2009 11:11 AM
Please respond to
standing.wave@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Our Sanctuary to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

As a frequent visitor to the Nomenus Wolf Creek Sanctuary, I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program on adjacent BLM land.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

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Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Carol Carmick

Carol Carmick

,

688

Nov. 20, 2009

RECEIVED
NOV 24 2009

Dear BLM,

My name is Monica Honegger, and I live at 20156 South Forest Hill Drive, Oregon City, Oregon 97045.

1. I oppose your plan to increase use of pesticides which would include 2, 4-D and the carcinogenic Diuron. I support alternative one - no herbicides.

2. Your DEIS did not include analysis of inert ingredients and relied on a Bush-Administration legal definition of the term Drift

3. Alternative Four would change your authority "to spray only noxious weeds" to "spray all vegetation.

Monica Honegger

RECEIVED
NOV 24 2009

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: Carlos Lewis 20156 S. Forest Hill Dr Oregon City, OR 97045

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!

689

690

RECEIVED

NOV 24 2009

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Kim Kauffman 91740 Winnebago St. Eugene, Oregon 97408

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!

691

Mark Mardon
<markmardon@fastmail.fm>
11/24/2009 01:42 PM
Please respond to
markmardon@fastmail.fm

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

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Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Mark Mardon

225 Harvard St.
,

692

Kenneth Zink
<kmzink@aol.com>
11/24/2009 01:00 PM
Please respond to
kmzink@aol.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

KENNETH ZINK

Kenneth Zink

1529 sutter st, vallejo, ca 94590
,

693

"Jason ; Smith"
<jaidsmith@yahoo.com>
11/24/2009 02:01 PM
Please respond to
jaidsmith@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Jason ; Smith

699

Joseph Saine
<imakestirfry@hotmail.com>
11/24/2009 03:09 PM
Please respond to
imakestirfry@hotmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

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Sincerely,

Joseph Saine

695

Chelsea Lincoln
<bakedancing@yahoo.com>
11/24/2009 03:56 PM
Please respond to
bakedancing@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,
Chelsea Lincoln

Chelsea Lincoln

,

696

Saffo Papantonopoulou
<saffo@riseup.net>
11/25/2009 12:17 AM
Please respond to
saffo@riseup.net

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Saffo Papantonopoulou

Saffo Papantonopoulou

,

(697)

Robert Hein
<darkfeyprime @yahoo.com>
11/25/2009 06:27 AM
Please respond to
darkfeyprime@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Robert Hein

533 NE Holladay st # 202
,

(698)

Rick Nevitt-LaMantia
<billytrickster @yahoo.com>

11/24/2009 08:02 PM

Please respond to billytrickster@yahoo.com

To orvegtreatments@blm.gov

cc

bcc

Subject Please Do Not Expose Me to Toxic Herbicides

Hello, It has been brought to my attention that the Oregon BLM is planning on increasing herbacidal spraying on public lands, It is apparent that little has been learned from the history of such archaic systems of land management. As populations grow larger and infringe more on previously unpopulated areas is it in the best interest of the public to make these new areas uninhabitable due to toxic chemicals in the soil? Clean up of toxic chmemicals found by new home owners would be astronomical to say the least, to say nothing of civil suits brought for birth defects and cancers. This is a really ill advised plan I suggest you prevent its implementation immedaitely.

My personal involvement in this plan is that I spend a lot of time in an area that is scheduled for treat with herbacides by BLM. The area to be sprayed is part of a watershed that drains into a spring water supply used at the Wolf Creek Sanctuary I spend time at on a regular basis . There is some current scientific evidence that the proposed herbacide has some potential affects on the immune system. I am already immune compromised and any assault on my immune system intentionally or collaterally is unacceptable to me and to any rational thinking human being. There is no imminent NEED for the proposed widespread spraying of these chemicals, While the affect on humans and wild life may be put them both in grave un necessary peril

WKhile I am not an expert in this field , but it is my understanding that 'Water Rights' can only be amended after a great deal of research and court hearings regarding the need to change such rights that have long been established. These 'RIGHTS' were originally established specifically to PROTECT the water uses of ALL parties concerned, especially from government gone wild.

kSpraying teh watershed above Wolf Creek will send contaminants into our water supply. There has been no environmental impact study filed at this point. I believe that until the BLM can assure the public in general and Wolf Creek wathershed users specifically, that complete scientific studies have been done and proven beyond any doubt that these herbacides are necessary and not dangerous to humans or wildlife.

I think you for your time and consideration, Sicnerely, Rick Nevitt-Lamantia

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

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herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

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Sincerely,

Rick Nevitt-LaMantia

699

Myles Downes
<megalomousiac@yahoo.com>
11/25/2009 07:57 AM
Please respond to megalomousiac@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Myles Downes

,

(700)

Day Schildkret
<dschildkret@gmail.com>
11/25/2009 08:47 AM
Please respond to
dschildkret@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Day Schildkret

701

David Kerlick
<davidk@eskimo.com>

11/25/2009 06:02 AM

Please respond to davidk@eskimo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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A much better approach: HIRE LOCAL UNEMPLOYED to take care of our lands, instead of writing checks to billionaire Monsanto executives and stockholders.

Sincerely,

David Kerlick

,

(702)

Andrea Thorpe
<andrea@appliedeco.org>
11/25/2009 11:42 AM

To orvegtreatments@blm.gov
cc
bcc
Subject comments: Draft Vegetation Treatments Using Herbicides on BLM Lands in Oregon Environmental Impact Statement (EIS)

Please accept the attached letter (.pdf file format) with our comments on the *Draft Vegetation Treatments Using Herbicides on BLM Lands in Oregon* Environmental Impact Statement (EIS). If you have any questions or difficulty opening the document, please contact me.

Yours,
Andrea

Andrea S. Thorpe, Ph.D.
Director, Conservation Research Program
Institute for Applied Ecology
PO Box 2855, Corvallis, Oregon 97339-2855
541-753-3099 ext. 401
www.appliedeco.org

Dept. of Botany and Plant Pathology
Oregon State University

Corvallis, Oregon Letter_BLM EIS_IAE Nov09.pdf

Institute for Applied Ecology

Mailing address:
PO Box 2855
Corvallis Oregon 97339-2855

Street address:
563 SW Jefferson Ave
Corvallis, Oregon 97333

Ph. 541-753-3099
Fax 541-753-3098

www.appliedeco.org

Bureau of Land Management
Vegetation Treatments EIS
P.O. Box 2965
Portland, OR 97208
orvegtreatments@blm.gov

25 November 2009

Re: *Draft Vegetation Treatments Using Herbicides on BLM Lands in Oregon Environmental Impact Statement (EIS)*

To Whom It May Concern:

We are writing in response to the recently released *Draft Vegetation Treatments Using Herbicides on BLM Lands in Oregon Environmental Impact Statement (EIS).* The Institute for Applied Ecology has partnered with several BLM districts in Oregon to conduct research on biology, management, and recovery of native plant and butterfly species; study and perform habitat management and restoration; and conduct research on effective control techniques for invasive weeds (including false-brome and meadow knapweed).

Successful management of BLM lands has been hampered by the limited use of herbicides. For example,

- In trials exploring non-herbicide control methods for meadow knapweed, we found that the only effective method for removing this weed is hand grubbing, a relatively expensive treatment method. Herbicides have been effectively used to control this species at neighboring sites.
- After eight years of studying various control techniques for false-brome, we found that herbicides can successfully be used to control this invasive species, while avoiding negative impacts to native species, including the threatened Kincaid's lupine, Nelson's checkermallow, and the endangered Fender's blue butterfly. Although manual techniques can be used to control false-brome in small areas, those areas are re-invaded within a year or two and manual techniques are not cost effective on large infestations.
- Each year, rare native prairie habitat is lost to invasive species since the current control methods are not effective at killing priority invasive species such as Canada thistle, Himalayan blackberry, annual grasses, and reed canarygrass. Judicious use of herbicides would enable the BLM to restore degraded wildlife habitat and improve conditions for endangered species.
- In a five-year study of restoration methods in Willamette Valley upland prairies, we found using a combination of burning and treatment with both a broad-spectrum and grass-specific herbicide was the most successful restoration method. When timed correctly, this treatment had minimal effects on established native species, but caused a significant decline in the cover of non-native species. In contrast, treatments without herbicides were ineffective in reducing the cover of non-native species or increasing the cover of native species.

We support both Alternatives 4 (the Proposed Alternative) and 5 for a number of reasons, including,

1. The Proposed Alternative allows the use of herbicides for the objective of managing habitat in conservation plans. The Draft Recovery Plan for Prairie Species of Western Oregon and Southwestern Washington calls for maintaining prairie habitat for five threatened and endangered species native to Oregon's Willamette and Umpqua River valleys. In addition to being threatened by non-native plants, these habitats are being negatively impacted by encroachment by exotic and native woody species. Several studies have found that the most effective and cost-efficient method of managing these prairies for native forbs and grasses is the combined use of herbicide, fire, and mowing treatments. In general, fire and mowing treatments were effective only in preventing further degradation of these habitats, not improving habitat conditions. These treatments can also stimulate growth of invasive plants from the seed bank and sprouting of woody plants. The careful use of herbicides has been very effective at maintaining prairie habitat by reducing the cover of non-native species and woody encroachment.
2. These alternatives allow greater flexibility in choosing an herbicide for application. As stated in the draft EIS, the herbicides added in these alternatives are generally more target-specific, can be used in lower doses, and are less likely to adversely affect non-target plants and animals than the four herbicides currently in use. This is particularly important when working in areas of degraded habitat where it is desired to preserve existing native species.

Although we support the adoption of the Proposed Alternative (4), we would also support Alternative 5. As recognized in the draft EIS, this alternative provides greater flexibility and will allow for more complete control of invasive weeds. Although the draft EIS focuses on the potential benefits for the east-side, there could also be benefits for weed control on the west side. For example, Chlorsulfuron is used to control tansy ragwort, puncturevine, thistles, and teasel, which are also invasive species on the west-side. Use of this herbicide would be allowed on the west-side under Alternative 5, but not Alternative 4.

In summary, we strongly support the adoption of either Alternative 4 or 5 in the *Draft Vegetation Treatments Using Herbicides on BLM Lands in Oregon Environmental Impact Statement (EIS).* The ability to appropriately use herbicides is greatly needed to effectively manage non-native species and restore habitat for Special Status Species.

Sincerely,

Thomas N. Kaye
Executive Director

Andrea S. Thorpe
Director, Conservation Research Program

Debora Johnson
Director, Habitat Restoration Program

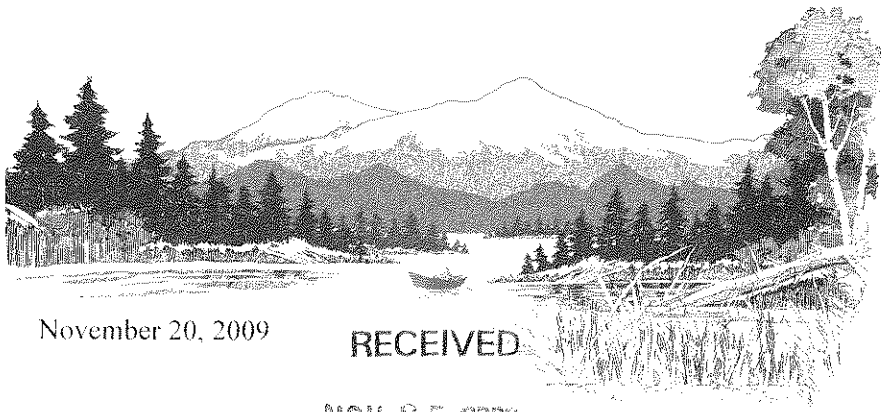
Matt Blakeley-Smith
Restoration Ecologist

Amanda Stanley,
Prairie Restoration Research Project Director

(703)

THE McKENZIE WATERSHED COUNCIL

"The river links us all"



November 20, 2009

RECEIVED

NOV 25 2009

BLM
Vegetation Treatments EIS
PO Box 2965
Portland, OR 97208

Through its consensus process the McKenzie Watershed Council was able to choose Alternative 3 as the preferred alternative, with the caveat that herbicides shall be used only as a last resort when other options have proven to be inadequate, ineffective or inefficient, and with the expectation that we will be notified and be allowed to comment well in advance of any proposed herbicide application in the McKenzie watershed.

It is the mission of the McKenzie Watershed Council to foster better stewardship of the McKenzie Watershed resources, deal with issues in advance of resource degradation, and ensure sustainable watershed health, functions and uses. Among other functions, the Council serves as an advisory body to established decision-making authorities and makes recommendations concerning the protection, restoration and enhancement of watershed resources. The Partners of the Council represent McKenzie Valley residents; recreational and commercial interests; water utilities; conservation groups; water consumers; and city, county, state and federal government agencies.

The McKenzie River is the sole drinking water source for residents in the City of Eugene, and one of our primary goals is to preserve the excellent water quality that we enjoy. We continue to be concerned about any potential adverse impacts to water quality.

The "last resort" qualification is consistent with our own policy concerning invasive plant removal. The Council prefers activities and practices that offer the highest net ecological benefits to fish and wildlife resources and water quality. Chemical herbicides will be used only after other methods have been used or considered for use and demonstrated from actual trials or literature search to be inadequate, ineffective or inefficient.

Thank you for this opportunity to provide comments.

Sincerely,

Larry Six
Executive Director

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: Sheila Cook - 1574 Coburg Rd, 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!

707

705

"Green, Donna"
<Donna.Green@pdxtrans.org
>

11/25/2009 01:02 PM

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

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

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Donna Green
Portland, OR

706

Carol Dunten
<carol.dunten@gmail.com>
11/25/2009 01:37 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Vegetaion EIS

We support the Proposed Action, Alternative 4 of the Vegetation treatments Draft EIS. We agree that the use of the additional herbicides would allow for more effective treatment of noxious and invasive vegetation. Medusahead rye is a big threat in our area. It is overtaking native ecosystems negatively affecting wildlife habitat, livestock and feral horse forage, and increasing fire danger. We are actively trying to control the spread of noxious weeds on our private property and it would be a great help if the medusahead rye infestations on adjacent land under the control of the BLM could be controlled.

Yours truly,

Carol Dunten

707

Carol Dunten
<carol.dunten@gmail.com>
11/25/2009 01:38 PM

To orvegtreatments@blm.gov
cc
bcc
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Yours truly,

Turen A. Dunten

708

Carol Dunten
<carol.dunten@gmail.com>
11/25/2009 01:39 PM

To orvegtreatments@blm.gov
cc
bcc
Subject vegetation EIS

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Yours truly,
Norma L. Miler

709

Carol Dunten
<carol.dunten@gmail.com>
11/25/2009 01:41 PM

To orvegtreatments@blm.gov
cc
bcc
Subject vegetation EIS

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Yours truly,

Miler Ranch, LLC

710

Carol Dunten
<carol.dunten@gmail.com>
11/25/2009 01:48 PM

To orvegtreatments@blm.gov
cc
bcc
Subject vegetation EIS

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Yours truly,

Tad Dunten

(711)

"Annette Carson"
<ctn12275@centurytel.net>
11/25/2009 02:05 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Vegetation treatment

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Yours truly,

Annette Carson
Diamond Oregon

712

Sue Bastian
<runsuebike@hotmail.com>

11/25/2009 03:46 PM

To <orvegtreatments@blm.gov>, <runsuebike@hotmail.com>
cc
bcc
Subject Toxic herbicide increases.

Wow! When was BLM bought by the chemical companies? Very impressive list of chemicals you plan to use to kill, mutate, pollute with maximum impunity. I can't believe the decision makers at BLM are so ignorant and insensitive to the people and the planet. I hope the chemical corporations are paying well for your soul and integrity.

Sue Bastian from Bend, Oregon who requests a response to this email.

713

Tim Pledger
<tjpledger@gmail.com>
11/26/2009 03:47 PM
Please respond to
tjpledger@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Tim Pledger

Wolf Creek, OR

(714)

stulips@hotmail.com
11/26/2009 07:06 PM

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

Requestor: stuart phillips
E-mail address: stulips@hotmail.com

Comments:
I Endorse Alternative 1, the no-herbicide option. For sure the least destructive, thanks. Don\'t spray toxins, herbicides or pesticides on any blm forestland anywhere in oregon ever! Thankyou.

715

Rozz Lieght
<yangshenmen@gmail.com>
11/29/2009 07:53 AM
Please respond to
yangshenmen@gmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me or the Forest to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Rozz Lieght

,

716

Richard Shadoian
<sfrichard@sbcglobal.net>
11/25/2009 09:10 PM
Please respond to
sfrichard@sbcglobal.net

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Sincerely,

Richard Shadoian

115 Beulah
,

(717)

rgsjesshuster@att.net
11/29/2009 08:51 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Richard G. Shuster

Requestor: Richard G. Shuster
E-mail address: rgsjesshuster@att.net

Comments:
To include in public comment:

As a property owner in the Bend, OR and Sparks, NV areas I am concerned about the planned Vegetation Treatments proposed. The use of chemical defoilants evokes horror stories of Agent Orange and the rainbow of other dioxins that have now killed over a 1/4 million US veterans and other citizens. The consideration of use of any similar chemicals on domestic US lands is beyond any reasonable comprehension.

A full and thorough analyses of all proposed components of the chemicals to be used demands to be provided to all citizens in the areas of proposed exposures.

Please advise me of the complete analytical details of proposed defoilants and make them also known to each and all citizens in the proposed areas of use on BLM and/or other public and/ or private lands.

Sincerely,

Richard G. Shuster

7062 Cinnamon Drive

Sparks, NV 89436

rgsjesshuster@att.net

720

Linda Driskill
<keystoneproject @ortelco .net
>
11/29/2009 07:05 AM

To orvegtreatments@blm.gov
cc
bcc
Subject comments

See attached comments on DEIS. Please acknowledge receipt.

DEIS herbicide use comments

Grant County Conservationists

keystoneproject@ortelco.net

November 30, 2009

Vegetation Treatments Team

orvegtreatments@blm.gov

Dear Vegetation Management Team,

The Grant County Conservationists are a conservation group that has been active in Grant County in Eastern Oregon for over thirty years. We work with the Malheur National Forest on many issues, but primarily in recent years on the restoration of aquatic habitat and keystone species and the impact on these by poor management of commercial livestock on the forest.

An excellent summary of your current proposal - to drastically increase toxic herbicide use on public lands in Oregon - has been recently made available to us and we would like to submit the following comments:

You PROPOSE to use more herbicides on the east side, stating that there is "higher public acceptance" of herbicide risks east of the Cascades! Whom did you query on this? The Oregon State Extension Service and the County Soil and Water districts, who work almost exclusively with ranchers? Were fish and wildlife biologists from the ODFW and USFS included? Were the Warm Springs, Paiute and Umatilla Tribes included? Were the environmental communities such as The Nature Conservancy consulted? Were the Native Plant Society and various Eastern Oregon birding groups encouraged to comment? We can hardly fathom that people concerned with native plants and insects, recovery of aquatic habitat and fish populations, bird numbers and habitat, etc. in Eastern Oregon are by nature more receptive to intensive toxic herbicide use than those on the West side.

You mention in your DEIS some alarming studies such as the one which led to the EPA proposal to prohibit sulfometuron methyl use within 100' of water and in situations typical of dry Eastern Oregon such as low annual rainfall and powdery or dry or light sandy soil. This potential hazard of any aerial spraying and other applications is sufficient to protest your plan to increase the number of treated acres three fold and the number of different herbicides by sixteen. Several of the latter are now considered so dangerous they are no longer used by the USFS (2,4-D and dicamba as well as a no-use call on diquat, diuron, bromacil and tebuthiuron).

We are disappointed that your proposed DEIS for herbicide use offers such a narrow range of alternatives. The DEIS notably reserves the most powerful and dangerous toxic herbicides for

alternative 4, the "preferred" alternative, and alternative 5 which would allow herbicide use for any purpose that BLM staff desire. This would appear to be illegal in that it would be impossible to predict and analyze potential environmental impacts of the most toxic, persistent, mobile and non-selective herbicides including 2,4-D, picloram, dicamba, glyphosate with POEA surfactant, triclopyr BEE, bromacil, diuron, hexazinone and tebuthiuron.

That you ignore the necessity of reducing various ground disturbing activities such as commercial livestock grazing, all-terrain vehicle access, roading for timber cutting, etc. is particularly inept. Our experience with commercial livestock grazing in disturbed ground on the Malheur National Forest shows the relationship of this management activity with the spreading of noxious species, such as *Ventenata dubia,* cheatgrass, Medusahead, etc.

By choosing to ignore the critical role of ground disturbance activities you are implicitly acknowledging that heavy spraying of highly toxic chemicals may not only not do any good but can compound serious environmental impacts to bees, birds (perhaps especially to threatened sage grouse), amphibians, fish and other wildlife such as deer, elk and pronghorn. As well as to humans who wish to gather berries, mushrooms, medicinal plants as well as recreate on public lands.

Thank you for the opportunity to comment.

Linda Driskill

Cc – select recipients of list serve

(719)

Phillipe Coquet
<Pcoq50@gmail.com>

11/27/2009 01:07 PM

Please respond to Pcoq50@gmail.com

To orvegtreatments@blm.gov

cc

bcc

Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

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Phillipe Coquet

,

(719)

Michael Port
<sapphy69@yahoo.com>
11/27/2009 03:36 PM
Please respond to
sapphy69@yahoo.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Michael Port

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(721)

Katie Fite
<katie@westernwatersheds .org>
11/26/2009 04:50 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Weed EIS

November 25, 2009

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

orvegtreatments@blm.gov

Dear Oregon BLM,

Please also include all concerns raised in these comments we had submitted on the BLM 17 States Weed EIS to this 2009 Oregon Weed EIS process.

It is also clear that much more information to form a baseline of data on current conditions must be provided to the public and USGWS/NOAA Fisheries before full consultation over effects on Threatened and Endangered species can be understood. The poor ecological conditions of many Oregon watersheds heightens the risks of drift and herbicide damage to non-target species and organisms.

A full analysis of the adverse effects of all herbicides and their associated chemicals –including where multiple chemicals may be used - must be conducted under real-world degraded wild lands situations. Increased weather extremes under climate change scenarios must be incorporated into this risk analysis.

A detailed analysis of the effects on killing or weakening biological crusts/microbiotic crusts must also be provided. Microbiotic crusts are also increasingly recognized as providing natural benefits in reducing climate change processes.

Thank you,

Katie Fite
Western Watersheds Project
PO Box 2863
Boise, ID 83701

February 9, 2006

Bureau of Land Management
Nevada State Office
Attn: Brian Amme, Weed EIS Project Manager
1340 Financial Blvd.
PO Box 12000
Reno, NV 89520-0006
vegeis@nv.blm.gov

Dear Brian,

Here are additional comments of Western Watersheds Project on the BLM's Draft Vegetation Treatments on BLM Lands in 17 Western States EIS incorporate by reference scoping, and comments provided at public meetings.

LIVESTOCK GRAZING AS A CAUSAL AGENT IN FIRE, FUELS, VEGETATION "PROBLEMS"

The Draft EIS fails to adequately address the role of livestock, and BLM and other agency management of livestock, on the ecological health and fire regime of lands across the Project area. It fails to present scientific information and analysis necessary to understand the role of livestock in causing fuels problems – including the role of ongoing livestock grazing across the lands of the EIS area and adjoining National Forest, state and private lands.

The EIS and alternatives are based on BLM's false premise that it can impose fire and other treatments to bring about "historical" ranges of fire occurrence and achieve some artificially derived "desired" future conditions. This is not based on the hard, cold facts that cattle and sheep grazing and other human disturbances in the arid West have created an UNNATURAL environmental setting – often with massive topsoil loss, lowered ecological site potential, desertification, and great vulnerability to weed invasion following disturbance. The risk of alien invasive species dominance of sites following BLM's proposed disturbance treatments interjects great risk into BLM's claims that it can restore lands by inflicting large-scale new disturbances.

In this setting, BLM's premise that chaining, fire and other disturbance will have beneficial outcomes, especially with no significant changes in land management (reduced grazing, roading, other continued sources of degradation) is unrealistic and not based on either common sense or scientific reality.

BLM must recognize the deficiencies of livestock grazing and other allocation components of Land Use Plans, and their role in contributing to hazardous fuels, weeds and other ecological problems. The livestock grazing and vegetation portions of many Land Use Plans are woefully outdated. New Land Use Plans ignore (example, Craters of the Moon, Black Rock) fail to address forage allocations in any way. There is no management requirement for conservative use levels, no specific new or updated allocation for livestock, no concrete habitat goals related to

livestock use, and BLM continues to apply known harmful levels of vegetation use.

Most of the old plans view threatened native sagebrush vegetation communities as "brush", primarily suitable for burning, spraying and discing up. The new plans fail to include necessary management guidance such as stubble height standards necessary for riparian protection, utilization levels necessary for successful sage grouse nesting, or grazing systems that protect microbiotic crusts necessary for soil health and keeping cheatgrass and other weeds that cause a fuels problem from invading. LUPs lack certainty, and especially newer plans lack application of specific use standards. All plans fail to address disturbance such as livestock trampling, and lack quantified trampling standards.

As management on the ground over the course of the EIS/PER will be carried out under out-dated old plans, and new plans with often even fewer standards and that do not address forage/stocking allocations, we believe it is not possible for BLM to predict rosy short, mid or long-term outcomes to its proposed treatments.

Neither the old or new Land Use Plans provide for protections necessary to slow down or halt weed invasions with associated alterations/shortening of fire cycles in areas invaded by annual bromes or other flammable weeds. The current scientific literature overwhelmingly shows that livestock grazing is a primary cause of problems affecting native vegetation, including altered fire frequencies and altered fuel situations.

An EIS grappling with weeds, and fire, fuels and vegetation treatment must address livestock grazing as a causal agent; analyze the impacts of livestock grazing in continuing to cause "unnatural" fire cycles and weed problems; honestly assess the impact of chronic livestock grazing on the ultimate outcome/effectiveness/success of any treatments; develop a range of alternatives that minimizes livestock and other disturbances as prevention and part of an Integrated Pest Management Strategy. Without including significant changes in livestock grazing practices including reduced stocking rates and/or removal of livestock from lands at risk to cheatgrass/weed invasion or dominance, or where restoration actions may be undertaken, and more protective levels and standards of use, BLM will be wasting taxpayer dollars on this Fire EIS effort.

BLM must fully address livestock as a causal agent in ecosystem disruption, and alteration of composition, structure and function of native ecosystems in the arid lands (see Fleischner 1994) covered by the EIS. The role of livestock in causing any fuels problem must be fully assessed, including all direct, indirect and cumulative impacts of past and ongoing livestock use on rangeland health problems associated with fire, hazardous fuels and weeds. A wide range of up-to-date livestock management alternative components must accompany all alternatives in this EIS process. These should include analysis of a range of reductions in stocking rates and use levels, and their effects on ecosystem processes, fire, fuels, weeds, restoration, rehabilitation efforts.

BLM must fully analyze reductions in, or cessation of livestock use and grazing permit retirement as part of any treatment analysis that is conducted. Federal fire funds should be used to

buyout and retire grazing permits on lands that are treated and where subsequent grazing will result in new weed problems, or still-intact lands determined to be at risk to weed invasion, or determined to be at risk of crossing thresholds from which recovery may not be possible. The inextricable linked fire/fuels problems and livestock grazing effects must be addressed.

Background information that must be presented and assessed includes:

- Current stocking rates (average actual use as well as active permitted use) in all allotments, and in all vegetation types and all lands where Field Offices slated treatment in information used to form the basis of this EIS/PER;
- Utilization levels and other management standards applied on the affected lands vs. current range science texts
- Current ecological condition of soils, vegetation, habitats related to stocking rates, levels of use allowed, etc.

See also additional WWP comments submitted separately.

ADEQUATE BASELINE INFORMATION ON VEGETATION COMMUNITIES MUST BE COLLECTED

Unfortunately, the Draft EIS does not provide adequate information on vegetation communities in the affected lands and their surroundings.

BLM must collect and analyze extensive baseline information on past fire and vegetation conversion or manipulation projects in the affected lands in each vegetation type identified in the DEIS/PER, and the effects of these treatments on wildlife corridors, habitat fragmentation, likelihood of human-caused fires or disturbance, etc. Data and maps must be compiled and assessed that indicate where all past treatments have been conducted. Without understanding the past dispersion and impacts of treatments and disturbance across the landscape, BLM can not adequately assess the impacts of various alternatives related to treatment and land health.

Information that needs to be acquired and assessed includes data and maps of:

- Past disturbance events on these lands (fire- prescribed or wild, chemical treatment, mechanical treatment – chaining, cutting, etc.);
- Seedings or any other post-disturbance treatments that have occurred and their current condition
- Condition of treatments and seedings, including cheatgrass and other fine fuels and weeds in interspaces
- Impacts of all livestock facilities
- Impacts of roading, and roading links to past treatments or livestock or other land uses.

Assessment should include a valid study of the current ecological condition and health of soils, vegetation, important wildlife habitats and other important values of the affected lands, a comparison between these conditions and conditions at the time of the disturbance.

For all lands where treatments have been identified by BLM Field offices, BLM must collect current information on: Vegetation species composition, its current ecological condition; livestock grazing regimen and standards of use; wildlife habitats and populations occurring here. Information on periods of rest, trespass, and other livestock factors must be included.

Current information on ecological condition, presence of weeds and other exotic species, etc. on all lands within the project area must be collected as part of this effort. It must be the basis for decisionmaking on "acres to be treated" for various purposes in the EIS.

For example, how many acres of salt desert shrub communities, Wyoming big sagebrush, or other communities have a significant component of cheatgrass in the understory? How many of these lands have already crossed thresholds, where succession is truncated? How many are at risk of crossing thresholds? How many acres, and what is the location, of each vegetation type is in good or better ecological condition?

After solid, on-the-ground collection of new information, BLM must develop a rigorous protocol for determining all lands in need of "treatment", and explain in comprehensive detail, with supporting science, why these lands need treatment.

We are alarmed that BLM in the EIS avoids focus on treating the extensive crested wheatgrass and other seedings that have so altered and largely destroyed wildlife habitats, and which often form the basis of stocking excessive numbers of livestock that also affect native vegetation in or near these seedings. Many crested wheatgrass seedings that resulted in the aftermath of past treatments have become infested with cheatgrass, halogeton or other weeds and now contain continuous fine fuels. In many seedings, exotics such as crested wheatgrass have been planted at unnaturally thick densities, and thus present an increased fire risk, or have significant components of cheatgrass in understories. Large wildfires sweep across such seedings - as in the 2005 Clover fire in the Jarbidge Field Office.

The harm and fragmentation of native species habitats caused by these seedings must be assessed – as it is important to in understanding their role in habitat fragmentation on top of the extensive alterations of habitat proposed by BLM under the DEIS/PER. Both the Jarbidge and Burley BLM lands provide a perfect example of a woefully fragmented landscape where crested wheatgrass seedings have greatly fragmented sage grouse habitats across middle to lower elevations, and many are in very poor condition and have rampant cheatgrass, halogeton and other problems – as well as loss of forage.

Yet, in Burley,BLM persists in promoting the killing of native vegetation (junipers, mountain big sagebrush, pinyon, and other species) in the Jim Sage and other areas, while ignoring the habitat loss, and weed and fire risks, posed by the crested wheatgrass and other purposefully altered lands, including those BLM itself "treated" with fire and which have become weedlands. The Weed EIS/PER continues blindly down this same path.

BLM, simultaneously with the Weed EIS/PER is developing other EISs – such as the

Upper Snake River District Fire, Fuels and Related Vegetation Management Plan Amendment. We attended that EIS Scoping meeting held in Boise, and just like the Weed EIS, BLM had no sound basis for estimates of acres proposed to be treated in the information that was provided to the public. We were told that BLM asked land managers in each field office to come up with estimates. However, there was no protocol followed as a basis for these estimates, and it appears no scientific methodology was followed. Our review of the USRD Draft EIS confirms that a systematic method to assess treatment "need" has not been used. Thus, not only does the Programmatic Weed EIS/PER not rely on, or provide, current ecological information necessary to make science-based decisions on public lands, neither do the lower level EISs that will tier to it.

Fire's Natural Role. The EIS must base its analysis on science, and not the mis-begotten hope that fire/other treatment disturbance will not result in harmful outcomes in many of the highly disturbed systems here. This is key to understanding that many of the predicted results are not attainable – especially if large-scale chronic disturbance factors like grazing continue unabated, and spread cheatgrass and weeds in their wake.

The EIS's discussion of vegetation communities and treatments ignores honest assessment of alterations in ecosystem composition, function and structure that exist in the real world as a result of livestock grazing and other disturbances, past vegetation treatments followed by livestock grazing, etc.

ECOLOGICAL RISK ASSESSMENTS FOR TREATMENTS MUST BE CONDUCTED

ICBEMP assessed lands and categorized them "at risk" to weed invasion. This EIS effort can build on that, and take a much more detailed look at the lands affected by this proposal. Shockingly, ICBEMP also found that only a very small portion of the entire Interior Columbia Basin had even "moderate" ecological integrity (PNW-GTR-385 at 118, Map 18). Large areas of lands are in "Low" ecological condition.

The DEIS/PER fails to provide information to tie proposed treatments to such land areas, and fails to assess the role (and ecological condition) of past treatments past and current livestock management (especially under out-dated paradigms and levels of use), and develop new goals, objectives and allocations that better address the pressing habitat needs of many important species and that address root causes of hazardous fuels problems, and thus provide better and more cost-effective protection from hazardous fuel and weed problems. What are the risks of treating wild lands, as BLM proposes, under the current alternatives, or under a new range of reasonable alternatives?

SUITABILITY OF LANDS FOR TREATMENT – WILDERNESS, ACECs, ROADLESS LANDS

We are very concerned about the lack of necessary analysis of the impacts of the various alternatives on: the integrity of ecosystem processes and natural values within WSAs, wilderness and other roadless lands; the relevant and important values of ACECs; the biotic integrity and

values to society and watersheds of undeveloped and roadless lands; the values of Special Recreation Management Areas and all lands where the public seeks wild or untrammeled natural landscapes. BLM's proposal will cause irreparable harm to values ranging from recreational, spiritual and aesthetic values, to unroaded watersheds that do not release road sediment to streams.

CAPABILITY AND SUITABILITY OF LANDS FOR LIVESTOCK GRAZING

In many areas of BLM lands across the West, sheep AUMs have been converted to cattle AUMs, with no necessary reduction in AUMs, and no examination of the impacts of sheep vs. cattle use, and the often decreased capability of steep, rocky or other terrain for cattle use (vs. sheep).

This capability and suitability of lands for livestock grazing must be assessed as part of any treatment this process. Please see USFS methods used in development of the Boise, Payette and other recent southern Idaho Forest Plans.

BLM regularly fails to employ analytical procedures described by Professors Holechek, Galt and others, and which the Forest Service uses in its grazing management, in setting stocking levels by first determining the amount of land area that is both "capable" and "suitable" for grazing.

Under the "capability" analysis, an evaluation is made to determine the number of acres of lands that are "capable" of livestock grazing, based on specific slope, distance from water, rockiness, and other factors. Then, out of the "capable" lands, a further determination is made about which acres are "suitable" for grazing, based on considerations such as special management areas, fragile ecological resources, or other considerations. After this analysis is done, then the remaining lands that are both "capable" and "suitable" are assessed to determining grazing levels by setting proper stocking rates. This analytical process is central to ensuring a proper grazing management system that does not degrade resources, and must be considered as part of the determination under various alternatives of the impacts or effects of the outcomes of any of the many large-scale disturbance treatments of fuels or weeds across vast acres that BLM is proposing in the EIS.

BLM must determine if stocking of grazing lands that are not capable or suitable is a major contributing factor to fuels and weeds problems.

All alternatives must include provisions for regulation of livestock disturbance based on current science and current capability and suitability determinations. This includes science-based standards of use, such as 25% or less allowable utilization of upland vegetation, no grazing during critical growing periods for native species, no grazing during nesting periods for migratory birds and sage grouse, measurement of livestock trampling damage to native vegetation and microbiotic crusts and means to minimize trampling damage, no movement of livestock from lands infested with exotics to more intact communities.

BLM MUST EXAMINE USE LEVELS, AND THEIR ROLE IN FUELS PROBLEMS

BLM does not take into account the scientific literature – including that published in the Journal of Range Management – demonstrating that utilization limits historically followed by BLM (typically, 40%, 50% or 60% utilization limits) contribute to degradation of native vegetation, and plant community changes that result in fuel and weed problems, and other ecological problems affecting a host of important habitats. These ecological problems include disturbance and loss of soils and microbiotic crusts that results in extensive weed problems. See Anderson 1991, Anderson and Holte 1981, Anderson and Inouye 2001, Belnap 1995, Belnap and Gillette 1997, Belnap et al. BLM Tech Bull. 2001, Belsky and Gelbard 2000, Beymer and Klopatek 1992, Braun 1998, Connelly et al. 2004, Donahue 1999, Fleischner 1994, Freilich et al. 2003, Galt et al. 1999, Galt et al. 2000, Gelbard and Belnap 2003, Hockett 2002, Holechek 1996b, Holechek et al. 1998, Holechek et al. 1999 a and b, Holechek et al. 2000, Holechek et al. 2001.

FULL RANGE OF PASSIVE TREATMENTS MUST BE EVALUATED

Passive treatments primarily minimize site disturbance, and generally remove or minimize an environmental irritant that is affecting the health of the plant community. Thus, they have less risk of soil erosion, weed invasion or proliferation and other negative impacts associated with them. They also have a high probability of being beneficial to watersheds, native wildlife habitats and populations and the economic well-being of western communities that are increasingly dependent on tourism and recreational uses of public lands.

An array of passive treatments (provided to BLM in the RNEA) exist that will enable BLM to treat many of the affected lands. Such treatments, wrongfully ignored by BLM, includes:

Livestock grazing treatment: Livestock grazing treatments can reduce spread of flammable invasive species, heal damaged understories so that more natural, cool-burning fires can occur, and reduce the proliferation of doghair thickets of dense young trees which serve as ladder fuels. Treatments include significant reductions in livestock numbers accompanied by prudent utilization and trampling standards in plant communities found to have damaged understories vulnerable to invasion by flammable exotic species.

Closure of pastures with known invasive species infestations. Closure of lands to grazing that have known exotic species infestations is a prudent first step toward control of spread of flammable, watershed-altering exotics.

Closure of pastures "at risk" to weed invasion – such as any Wyoming big sagebrush, Basin big sagebrush, or juniper communities that still contain relatively intact understories. This EIS process should map and identify such areas, as well as all areas where cheatgrass already dominates the understory.

Livestock removal treatment: Grazing permit buyout and permit retirement using federal fire funds is a very reasonable treatment that will heal damaged lands, help restore natural fire cycles, minimize the spread of exotics and other hazardous fuels.

Livestock facility removal treatment: Livestock facilities (fences, artificial watering sites –

especially troughs associated with pipelines and water haul sites, corrals, etc.) serve as zones of livestock concentration, and result in areas of severe disturbance readily colonized by highly flammable exotic species. Removal of these facilities and restoration of disturbed zones will limit spread of invasive flammable species, and help develop healthy understories necessary to carry cool, light fires in surrounding lands.

We are alarmed that BLM's Draft EIS casually casts aside Alternatives development based on a series of passive livestock treatments, and fails to adequately explain the ecological benefits of such treatments.

Road/ORV trail closure and rehab/restoration treatment: Closures and restoration treatments quell the spread of flammable invasive species from disturbed road and trail edges. Roads are known to serve as conduits for weed invasion (Gelbard and Belnap 2003). Then, domestic livestock spread weeds from road or trail margins crosscountry into wild land areas.

Road closure coupled with grazing reductions can have large-scale positive effects, as roads as weed conduits can be closed, and livestock reductions minimize spread of weeds already present within the area.

Allowing natural successional processes and healing processes to occur in plant communities that are still relatively intact is the most cost-effective method of attaining natural fire cycles, reducing buildup of hazardous fuels over time, etc. Natural mortality occurs in sagebrush, sagebrush-bitterbrush and other vegetation types. Allowing natural processes to play out, while removing or minimizing those agents that are disturbing natural ecological processes takes patience, but minimizes risks of exotic invasion that accompany aggressive intervention such as fire or mowing.

HAZARDOUS FUEL

If BLM plans on using this term in its analysis, we ask for a careful and scientific description of the basis for its use. For example, Idaho Falls BLM engaged consultants to prepare an EA for "hazardous fuels reduction" in Sands Checkerboard. We are uncertain just what the hazard is here. Who or what is threatened by the woody vegetation termed hazardous fuels? Is cheatgrass a "hazardous fuel"? We certainly think this term is far more apt for cheatgrass than it is for most other vegetation situation where BLM applies it. BLM must develop a methodology to prioritize any "treatments' of hazardous fuels. This is necessary to most effectively spend scarce taxpayer dollars, best protect habitations and areas that are truly "at risk". Instead of spending hundreds of thousands of dollars planning 6-10 million dollars or more of "treatments" in the Jim Sage Area, or drastic "treatment" of the entire Samaria Mountain Range, These projects are primarily aimed at killing woody vegetation to promote livestock grazing. BLM must use a sound methodology to determine needs for treatment – and focus should always be on the areas within approx. 1/8 mile of actual interfaces with human habitation.

RESTORATION

Restoration of native vegetation communities and ecological processes must be the goal of all treatments. Restoration means restoring and maintaining ecological integrity. Ecological integrity is the ability of an ecosystem to support and maintain a balanced, adaptive community of organisms having a species composition, diversity and functional organization comparable to that of natural habitats within the region.

Lands of primary focus for most active restoration should be: Lands that have been invaded by flammable exotics such as cheatgrass or medusahead; and Lands purposefully seeded to alien species such as crested wheatgrass following past agency vegetation manipulation, fire, livestock damage, etc. These should be prioritized for treatment on the basis of: Geographic location and continuity/connectivity of native habitats that restoration would provide for native species. For example, crested wheatgrass seedings in the Little Lost River Valley are located in an area of great importance to sage grouse. Restoring the native sage-steppe vegetation on these sites as habitat for sage grouse and pygmy rabbit should be top priority, as well as prevention of any further degradation to still-native communities.

BLM must focus significant treatment and restoration efforts and spending of federal fire funds on restoration of native species composition and function to crested wheatgrass that has been rampantly seeded as following ill-conceived sagebrush removal or as post-fire "rehab", and lands overrun by cheatgrass. The current abundance of federal fire funds should be used to follow-through on BLM **post-fire rehab actions that have failed** in the past (please evaluate all seedings and identify failures and causes of failure), or where crested wheatgrass and other exotics were planted as a first step in arid lands rehabilitation.

BLM should use this EIS/PER as an opportunity to complete post-fire rehabilitation that has failed or had poor results on likely tens of millions of acres across the arid West. As part of this EIS/PER process, BLM should identify all lands where post-fire rehab/"emergency" stabilization with crested wheatgrass, intermediate wheatgrass and other exotics was conducted, and prioritize treatment of these lands to return them to native vegetation and restore natural fire cycles.

Experimentation with new techniques should be limited to lands overrun by cheatgrass and crested wheatgrass seedings.

For lands still in reasonable health with reasonable ecological integrity, passive treatments should primarily be applied. Techniques which minimize soil and native vegetation disturbance should be the first steps taken. Try these first. See if they work.

As the result of past proliferation of purposeful seedings of exotic species by BLM in te wake of past treatements or wildfire/ESR, huge sterile monocultures of exotic species dominate millions of Idaho BLM lands. These seedings, a result of activities to produce forage, sometimes under post-fire ESR, have had disastrous consequences for native ecosystems. Plus, instead of restoring lands seeded immediately after fire to exotics, BLM instead has let these lands persist in a highly altered and unnatural condition. BLM now manages these seeded lands as permanent BLM sacrifice zones to the livestock industry – issuing TNR, converting TNR to permanent AUMs, etc. It is these post-fire seedings, a direct result of BLM's short-sighted livestock forage or ESR

efforts of the past, that have been used as the basis for massive AUM increases to wealthy permittees, in the Jarbidge Field Office.

BLM must fully assess the impacts of these past actions in order to understand the context of your current decisionmaking process, as well as to assess environmental impacts and reasonably foreseeable outcomes.

As part of this EIS, BLM must consider restoration of native vegetation on all lands initially seeded to exotics in past or future ESR activities. This NEPA document should include a timetable for accomplishing this.

PREVENTION

Arid lands may become so degraded that they can never recover. These communities have been described (Archer and Smeins 1991) as crossing a "transition threshold" –with loss of topsoil, dominant species that have become locally extinct, and introduced species that have become so dense that weedy annuals become the climax species. All efforts must be made to keep plant communities from crossing this threshold, and thus requiring massive amounts of funds and elaborate treatments to attempt restoration.

Moderately degraded communities can become severely degraded if preventive action is not taken, or if new disturbance accelerates degradation or weed invasion.

Pristine and near-pristine lands should be protected using all possible techniques, especially passive restoration techniques such as immediate removal or reduction of livestock disturbance. Such lands typically serve as important habitats for native species and protection of biodiversity. Economically, it is a lot more cost-effective to keep lands from becoming degraded than it is to conduct wide-scale treatments after they have become degraded. It is critical that a BLM Weed EIS do so.

Prevention is especially important in upland communities, as they are less resilient to recovery following site disturbance than are riparian areas. Plus, the greater the aridity, the greater the difficulty of recovery. This may even vary within the same geographic area, as south and west faces are more likely to face cheatgrass invasion following treatments.

Almost universally, wetlands (springs, seeps, streams, playas, etc.) have been heavily damaged by livestock grazing and trampling activity. This has altered their morphology, areal extent of water tables/wetted soil areas, plant and animal species composition, plant and animal ecology. However, the current path of agencies shifting livestock use onto upland sites to take pressure off riparian areas is an ecologically destructive path, and prevention must be conducted in an integrated way. Both the riparian and upland areas are undergoing desertification processes, which ultimately make them less resilient, and less likely to be able to be restored to native systems.

ROLE OF DESERTIFICATION IN FUELS AND FIRE PROBLEMS AND ECOSYSTEMIC

CHANGE

Please see our "Additional Comments" explaining the role of desertification caused by livestock grazing and other activities in causing fuel and weed problems.

WEEDS AND INVASIVE SPECIES

Exotic species are invading lands in the Interior Columbia Basin and across the arid West at an alarming rate. Exotic species alter western ecosystems by increasing fire frequency, disrupting nutrient cycling and hydrology, increasing erosion, altering soil microclimates, reducing biodiversity, and reducing wildlife habitat.

Disturbance related to livestock grazing, livestock grazing facilities, ORVs and extensive road networks are causes of weed invasion. Removing these sources of disturbance from "at risk" lands, and any lands that have been treated is a vital and integral part of any treatment, as well as prevention and restoration.

Livestock and ORVs are weed seed vectors. Livestock carry weed seeds in fur, feces, mud on hooves, etc. They also disturb soils and created ideal sites for weed seed establishment (Belsky and Gelbard 1999).

Recent observations show that exotics like cheatgrass and medusahead may be only the first in a wave of exotics and that new infestations of aggressive species such as white top or knapweed occur in areas overtaken by cheatgrass and medusahead. Thus, BLM's current practice of using these weeded areas as "sacrifice zones" for excessive levels of livestock use, issuance of TNR, etc. only increases chances of invasion by new and even more aggressive exotic species, and continues to cause large-scale fires – Jarbidge BLM lands 2005 Clover Fire serves perfectly to illustrate this.

REMOVAL OF LIVESTOCK

Livestock grazing and trampling is the major cause of damage to upland plant communities and western ecosystems, and the major factor preventing recovery of these systems.

Removal of livestock, including through use of federal fire funds to permanently buy out grazing permits, must be a treatment that is evaluated under all alternatives. Lands should be prioritized for buyouts, based on the need for passive and active treatment measures to be applied.

It makes no sense to spend hundreds of dollars an acre on "restoration", or $40 an acre on a "prescribed" fire treatment if livestock grazing disturbance is then to again occur. Livestock are the primary cause of vegetation/fuels problems. Allowing the primary causal agent of weeds or fuels problems to then again be allowed to graze and trample these same lands, and cause a "need" for future treatments, makes no sense at all. BLM typically receives around 13 cents an acre annually for livestock grazing on these lands, so the economic folly of returning livestock to treated lands is extreme – just like the ecological folly.

REST FROM LIVESTOCK

BLM's EIS and the "updated" EFR plans are woefully deficient in providing adequate periods of rest from livestock grazing following treatments. In order to determine necessary rest periods, BLM must understand the condition of the community pre-treatment (see, for example, Eddleman et al 1994 describing poor or fair condition lands requiring signifcant periods of rest post-treatment). Specific time periods must be applied (5-10 year minimum), along with measurable recovery standards for soils, microbiotic crusts, herbaceous and woody vegetation recovery before livestock grazing can resume.

FIRE

BLM can not use "natural fire regimes", historical ranges of variability and other models as a basis for any fire planning. The potential for anything resembling a "natural "fire regime has been drastically altered by 150 years of livestock grazing and other disturbance so that natural fire regimes no longer exist in many areas. The imposition of the disturbance that would mimic a natural fie cycle is likely only to further degrade values of public lands – soil water, watershed, wildlife and important and T&E species habitats. As part of its assessment, BLM must first determine the current condition of all the vegetation communities in the affected lands. This information must be newly collected as part of this process, since most BLM inventories, especially in these lands with ancient LUPs, are nearly 25 or more years old. This necessary is critical to understanding the risks of any treatment disturbance to these lands.

We believe that until effective answers are found for the vexing problems of invasive weeds such as exotic annual grasses, a cautious and prudent fire suppression plan must be in place across arid lands of the Project area. This is also necessary because of the unnatural and unstable condition of many sites caused by 150 years of livestock grazing.

FUELS REDUCTION

Shrub-Steppe Communities: Livestock grazing has fundamentally altered (and continues to alter and degrade) native understories, by killing and weakening native grasses and forbs and harming microbiotic crusts. As native bunchgrasses have been replaced by cheatgrass and other exotics in the wake of livestock grazing, plant communities are now subject to hot, early season fire instead of cooler, late-season fires. Cheatgrass provides dense, continuous fuel that causes fires to flash across the landscape. Cheatgrass results in frequent re-occurrence of fire, preventing regrowth of native vegetation. Plus, cheatgrass litter chokes soil surfaces, preventing germination of native shrubs (sagebrush, rabbitbrush). Fuels reduction in sage-steppe communities should focus on restoration of these cheatgrass-invaded sites and damaged understories. This is the primary active restoration measure/treatment that needs to be taken to fundamentally alter the nature of fire in these arid lands.

Low Elevation Forests: Here too, livestock grazing has fundamentally altered (and continues to alter and degrade) native plant understories. By creating abundant areas of bare soils, it creates

ideal conditions for increased densities of young trees. These become the fire-prone doghair thickets of young trees that create ladder fuels and other incendiary conditions in arid forests.

Before Euro-American settlement, periodic fire cleared Ponderosa pine and Douglas fir understories, and the build-up of fuels was too slow to create hot canopy fires. With Euro-American settlement, and continuing to the present: 1) Selective logging of large trees occurred, and small, highly flammable trees were left; 2) Fire control was instituted; 3) Domestic livestock consumed grasses that carried low-intensity fires, and such fires became less frequent, and woody fuels built up.

Hot fires occurred in the past, and were a part of natural forested ecosystems. In many areas away from human habitation, fuel reduction may not be necessary.

To prevent buildup of woody, highly flammable fuels in arid forests at times need to be let burn under carefully controlled conditions. This should only occur in lands that are not at risk to exotic species invasion in the post-fire environment. Selective logging of old, fire-tolerant trees must be halted. Domestic cattle and sheep grazing must be decreased or ended.

JUNIPER, PINYON-JUNIPER

Juniper and other woody vegetation throughout the West have been vilified by the ranching industry. Pinyon-Juniper and juniper on many BLM-managed lands have been greatly fragmented by purposeful fire, escaped prescribed fire and wild fire. BLM has not demonstrated that it can fix the cheatgrass mess it has made in juniper habitats, as with prescribed-fire on lands such as Rice Canyon in the Burley District. Until BLM shows it can show restoration of the many already treated arid sites and return them to good or better ecological condition, BLM should not set out on a course of new disturbance.

Juniper removal should be highly selective, individual tree cutting of smaller-sized trees. Fire or extensive soil disturbance paves the way for weedy species invasion in juniper communities. Grazing causes juniper expansion by destroying and weakening native understories, and altering natural cool burning fires and fire cycles.

A CRITICAL AND METHODICAL EXAMINATION OF SUCCESS/FAILURE OF PAST BLM TREATMENT PROJECTS IS NECESSARY

A careful scientific evaluation and assessment of past BLM "treatments" must be prepared. How many acres have been burned in prescribed fires? What post-fire management was done by BLM? What were the results? What are their current vegetative communities? What past herbiciding has been done by BLM? Where? How many acres? What were the results? How many acres, and where, was post-fire rehab. done? What is the current condition and vegetation of these lands? Please provide maps that adequately depict the above information.

FIRE SUPPRESSION

Fire suppression is critical in areas of high ecological value habitats that are "at risk" to exotic species invasion following fire, areas where irreplaceable ecological values, human life, or cultural resources are at stake. Effective fire suppression plans must be in place for these lands. This is a critical component of minimizing rapid weed dominance.

BLM must provide information on the risks of prescribed fire escape, or raging out of control. This has happened repeatedly on Ely BLM lands, including near Cherry Creek in 2005.

Minimum impact suppression tactics should be followed.

PRESCRIBED FIRE

Prior to conducting any prescribed burn, BLM must establish a methodology to thoroughly consider and analyze, in an open NEPA process with full public comment and review periods, the following:

Long-term damage to microbiotic crusts, soil erosion through wind and runoff events, long-term loss of nutrients from already nutrient-deficient landscapes, loss of native species, radionuclide levels in surrounding vegetation, interrelation between prescribed burns and other "treatments" on neighboring federal/state/private lands, increased risks of exotic species invasions, impacts on habitat for native wildlife, indigenous uses of plants that may impacts, air quality impacts.

We are very concerned that BLM may initiate a program of widespread "prescribed" burns on lands that have been, and continue to be, seriously damaged by livestock grazing and other abuses, and which will are very vulnerable to exotic invasions in post-fire environments.

All fuels reduction projects must be based on comprehensive restoration assessments before any reduction takes place.

USE OF LIVESTOCK AS A "TOOL"

Livestock (cattle and sheep) should not be used as a "tool" or termed a "biological control". They are only a temporary, stop-gap measure and simply mowing weeds to ground level does not address the fundamental problem of eliminating weeds, and getting native species to grow. Native species will not recover if sites are grazed by livestock. In fact, the extreme disturbance caused by livestock will make sites MORE fire prone, harm remaining native species, increase likelihood of new or accelerated weed invasions, and increase disturbance to, or competition with, native wildlife.

In most instances, it would be just as effective to mow weeds as to use livestock, and would have far less impacts to soils. Plus, the possibility of introduction of new weedy species as a result of livestock disturbance would be minimized. BLM should examine the appalling fire history of the Jarbidge FO and assess how seeding of crested wheatgrass, harmful levels of livestock use, high stocking rates, etc. – have resulted in extensive and large acreage fires.

USE OF HERBICIDES

Herbicide use should be kept to an absolute minimum under all alternatives. Herbicides are known carcinogens. Many herbicides migrate in soils and infiltrate water supplies. Upper Snake River District's disastrous experience with the herbicide Oust demonstrates the dangers of herbicide use in wild land settings, and how despite reassurances in EAs, things can go very wrong. Here, Oust blew on soil particles into neighboring fields, and inhibited crop germination. We have seen wild settings where application of Oust has likewise had disastrous results – including in the "dead zone" it created in Rice Canyon in the Burley Field Office, and in the Jarbidge WSA Middle Butte fire area. For several years prior to the Oust drift onto ag. crops disaster, the corporation that manufactured Oust aggressively marketed its use at weed seminars attended by federal agencies. We are quite suspicious of the role of chemical corporations in pushing the use of herbicides, and are alarmed that this harmful chemical is now being proposed by BLM for use.

At the best, herbicide use is only a temporary measure or intermediate step to be used, and it does not address the basic causes of weed problems. A range of alternatives without use of sulfonylurea and acetolactate synthase-inhibiting herbicides should not be developed. This is essential due to the demonstrated ability of these chemicals to damage off-site plant species.

We often encounter areas on public lands – such as leafy sprurge spraying in the Lost River Area or white top spraying near Battle Mountain or on the Owyhee Front – where all native veg. has been killed by herbicides, and leafy spurge continues to thrive. The role of continued livestock grazing post-treatment in continuing weed invasion must be addressed – and the EIS does not do this.

MECHANICAL TREATMENTS

BLM should focus on use of mechanical methods of weed control that have been identified as effective in current scientific literature (mowing, spot fire (flamer), weed eaters, mulching).

Any mechanical removal of woody vegetation must be carefully conducted, and the current BLM mania to mow sagebrush sharply curtailed. Any removal of trees must be based on individual tree marking.

All off-road travel should be minimized during any mechanical treatment. The DEIS/PER fails to take necessary measures to do this.

All fuels reduction projects must be based on comprehensive restoration assessments before any reduction takes place. The DEIS/PER fails to provide any methodology to do so, and completely ignores restoration assessments.

MIGRATORY BIRDS/CRITICAL PERIODS/SAGE GROUSE

No treatments of any kind should be allowed during nesting periods for migratory birds, or in

important or critical wildlife habitats during sensitive times of year such as winter in sage grouse wintering areas. The role of all past and proposed treatments on habitat fragmentation must be assessed. See Knick et al. 2003, Connelly et al. 2004 to understand the tremendous fragmentation that exists.

BIOMASS PROBLEMS

Use of material for biomass fuels should not be allowed. Biomass projects export nutrients from often nutrient-deficient sites, and reduce litter and ground cover, leading to greater site aridity. Biomass removal results in removal of woody debris and other important habitats for native wildfire, or plant materials that may be important for watershed stabilization, and that ultimately provides in-stream habitat structure for aquatic species, including TES fish species. Biomass use is an extractive, commercial use of public lands with widespread harmful ecological impacts.

Nowhere does the EIS/PER address the acreage, location or expected impacts of biomass under the proposed actions.

PREVENTION

BLM's vegetation efforts can not be limited to disturbance-style treatments alone. Plant communities which are still healthy should be managed in a way to effectively: 1) prevent their conversion to weed-dominated communities; 2) prevent loss of biodiversity; 3) prevent changes in their fire frequencies and intensities; 4) prevent the conversion of shrub lands to woody thickets.

BLM's DEIS/PER ignores analysis of a range of prevention-based Alternatives.

EIS/PER ASSESSMENT

An independent assessment of the "need" for the proposed actions, and the risks of undertaking new disturbance must be conducted as part of this process. We would like to be involved with this effort, and would be happy to provide you with a list of names of scientists that could be involved in this. This should be conducted by qualified ecologists not tied to Western Land Grant universities.

A component of this should be an assessment of risks of new, additive or cumulative disturbances associated with the projects on top of existing disturbances. For example, if an area unrelentingly subjected to livestock grazing has previously been "thinned" by old herbiciding or fire, what will the impact of a new treatment disturbance be on soils, vegetation, watersheds, water quality, native wildlife, etc.?

We urge you to focus on actual Interfaces with habitation, and not the large-scale wild land disturbance you propose.

ADDITIONAL SPECIAL STATUS, T&E SPECIES CONCERNS

The actions of the EIS will have large-scale effects, ranging from increased sedimentation of bull trout and redband trout streams to major fragmentation of sage grouse, Brewer's sparrow, pygmy rabbit, pinyon jay and other declining species habitats. The EIS fails to address this fragmentation, on top of the fragmentation that already exists – see, for example, the analysis of fragmentation on the Sage Grouse Conservation Assessment (Connelly et al. 2004). The EIS is lacking in basic information on soil stability, erosion hazard, wind and water erosion risks, etc. related to lands proposed for treatment.

This is critical for understanding likely sedimentation into streams, site soil stability post-treatment, likelihood of increased gullying, and other factors. Special status species habitats are faced with a broad array of escalating synergistic and cumulative impacts to habitats and populations – ranging from development of new livestock infrastructure and expanded water-hauling to energy developments such as wind or geothermal and associated roading and disturbance across public and private lands of southern Idaho.

MONITORING AND MITIGATION

We are extremely concerned that monitoring and mitigation in the DEIS/PER are not adequate and do not even begin to address the large-scale disturbance of plant and animal community composition, function and structure that undertaking the large-scale treatments will affect.

Monitoring. The EIS fails to provide necessary monitoring, and decisive actions that will occur post-treatment if treatment protocols, livestock rest, etc. is violated. BLM should establish specific post-treatment criteria for monitoring for livestock trespass, sound studies of soil health, stability and recovery, etc.

Mitigation. Large blocks of land (> 10,000 acres) should be established within watersheds where no grazing or treatments are conducted, as reference areas for the outcomes/effectiveness/damage of the treatments that are proposed. Other mitigation includes termination of grazing disturbance on reference areas.

POST-TREATMENT ACTIONS

BLM current enforcement of grazing closure restrictions is incredibly lax – we have documented burn trespass after burn trespass where BLM has failed to administer more than a handslap - or simply ignored – permittee trespass of burns. For example – Rice Canyon – Burley BLM; Diamond A – Simplot livestock – Jarbidge BLM. Thus, we have no assurances that any livestock-related post-treatment measures will be followed, and these can not be used as "mitigation" for treatments.

MITIGATION AND MONITORING

BLM must develop adequate mitigation for activities carried out under this EIS. For example, if BLM wants to burn or thin 10,000 acres of sage grouse habitat, it should be removing livestock

use from 10,000 acres of suitable habitat in order to provide better quality nesting and wintering habitat, not allowing livestock use to continue on neighboring lands.

BLM must develop a comprehensive monitoring plan with specific schedules, with all monitoring to be funded as part of the original "treatment" cost. Otherwise, timely and necessary monitoring will never occur.

USE OF NATIVE PLANTS AND LOCAL ECOTYPES

BLM must commit to mandatory use of native species, and local ecotypes not over-s9zed cultivars, in all post-treatment plantings. BLM cannot rely on the old excuse of seed being unavailable or too expensive for use. Use of all native seed with commitments to reseed repeatedly must be part of the planning and funding for all projects. Planned development of reliable supplies of native ecotype seed sources is essential.

WILDLANDS-URBAN INTERFACE

Any habitation interface projects must focus on projects at the actual interface with inhabited lands. This is an area of 1/8 mile or less. Any interface projects must be tied to private landowners taking strict efforts to control any fire danger on their own private lands. Intensive wildland-urban interface treatments include thinning, pruning, mowing, roof cleaning, replacement of flammable landscape and building materials). These actions should be limited to the interface, and the private property, and be use to create 1/8 mile of defensible space.

In reality, the interface is to be the area where most federal fire funds are being spent. Instead, BLM across-the-board is roaming far from any real interfaces in projects being conducted.

As part of this EIS, BLM should provide detailed maps of all interfaces, and a list and report of all criteria used to determine the existence of an interface.

COST: BENEFIT ANALYSIS

BLM must provide an adequate cost: benefit analysis of all actions. For example, what are the costs vs. the benefits of spending $100 an acre to treat/restore lands where livestock grazing will again soon resume?

What are the costs to recreational uses of public lands of large-scale treatments? We have been repeatedly contacted by hunters, hikers and birdwatchers who have had recreational outings – or favorite recreational sites - ruined by BLM "treatments". What impact do such losses have on the local and regional economy?

For example, in BLM's flawed Burley FO Jim Sage EA, BLM planned to spend 6 million dollars to kill junipers "hazardous fuels" across an entire mountain range, despite widespread weed problems throughout the lower and middle elevations, and BLM grazing proposals underway would have increased grazing on the "treated" lands. Thus, taxpayers would have been funding

increased livestock forage under the guise of fuels projects, while receiving only tiny amounts of grazing fee dollars in return. This is just the type of thing that we fear will occur under EIS/PER.

BLM must adequately analyze a full range of alternatives based on sound economics. All alternatives should include use of federal fire funds to purchase grazing permits and permanently remove livestock from degraded lands, as this is a very foreseeable action during the life of this plan. We support an alternative that uses preventive measures and passive restoration techniques, addresses causal agents of fire/fuels/vegetation problems such as livestock and ORV use, and which minimizes risks of invasive species spread stemming from any treatment that is applied.

WIND AND WATER EROSION

Actions under the Alternatives of the EIS/PER will bring about widespread soil erosion and relocation in wind and water. In order to understand the impacts of the actions, the current condition of all lands (soils, veg, microbiotic crusts, etc.) must be thoroughly assessed. The EIS fails to assess effects of multiple or overlapping treatments. For example, how will herbicide runoff be accelerated in burned landscapes? This also relates to air quality problems, and possible increased air or water pollution on top of other pollutants. Recently discovered mercury contamination of Idaho waters and lands from gold roasting in Nevada must be considered in this analysis, also as these substances will pollute waters on top of the chemical, sediment or other substances from treated lands.

RELATED ACTIONS

BLM and the Forest Service often embark on fire-related/treatment projects. The interrelationships of all ongoing or planned activities in this region, including across ownership boundaries, must be fully explored.

COMMITMENT TO OPEN NEPA PROCESS

The BLM must require as part of the EIS/PER ROD that all future projects that are tiered or related to this EIS undergo, further environmental review at the level of an EA or EIS with full and open public comment and participation in the process. At present, agencies (such as Ely or Elko BLM) are conducting CEs, or closed door EAs (Spruce Mountain) for Treatments of every ilk, and barring the door on effective public input, and necessary environmental effects analysis. BLM just proposed changes that would allow grazing permit renewal to be conducted under CEs – thus there is no certainty that any environmental problems related to grazing will be fixed, or their impacts adequately assessed, on the lands where EIS/PER treatment would occur.

POST-TREATMENT, EFR

Idaho BLM's recent ESR/EFR updated protocols were big disappointments and relied on limited, outdated, or no science and ignored many actions necessary to ensure site recovery. BLM should use this EIS process to set science-based post fire/treatment standards to be incorporated in all ESR agency plans.

Use of Native Species: BLM must commit to use native species in all restoration seedings in all instances. In the past, BLM has used exotic, soil depleting crested and Siberian wheatgrasses, and aggressive, invasive, weedy forage kochia and intermediate wheatgrass. Instead of focusing on larger exotic plants (primarily because they produce livestock forage, no matter how limited its palatability), BLM must use natives, especially species like *Poa sandbergii* , bottlebrush squirreltail and Indian ricegrass in lower elevation sites. In the past, BLM has failed to rest lands for sufficient periods of time to allow successful establishment of seeded native species.

As part of this EIS, please provide a science-based (not livestock-forage-based, but ecological science-based) assessment of predicted establishment times for seedings or recovery of native vegetation under the various environmental settings, and include in this predictions of "success" with specific livestock rest periods much greater thanare now applied. Please also thoroughly describe and assess the ecological impacts of the exiting seedings – impacts on soils, waters, vegetation, weeds, native biota, recreational and cultural concerns.

BLM must closely study the lessons provided by the bluebunch wheatgrass seeding in an ungrazed area near Kuna Butte in the Four Rivers FO – and any examples the agency may have across the West. Due to no grazing occurring for a decade, seeded bluebunch wheatgrass was surviving and thriving at low elevations. In addition, please use existing exclosures as reference areas for comparison of effects of no grazing for several years following a fire, vs. BLM's typical woefully inadequate 2 growing season's rest. There are also exclosures in the Jarbidge FO that can serve as reference sites and comparative examples. One is located north of Winter Camp Butte, others are near Roseworth. Please visit these sites, and quantify the differences between vegetation inside and outside these exclosures, and use this information in developing a realistic time frame for livestock exclusion from seeded lands.

Sagebrush and other appropriate native shrubs (winterfat, shadscale, rabbitbrush) must be included in all post-treatment seedings, and repeated efforts must be made to establish native shrub cover, due to its importance to many native wildlife species.

BLM must use some of its burgeoning fire funding to set up a reliable network and system for supply and storage of native seed, including locally adapted ecotypes, so that this native seed is readily available in the wake of fire. BLM will then no longer have the time-worn excuse that "we couldn't get native seeds, so had to plant cwg". It is time to act responsibly, and apply federal fire funds to setting up a reliable system of seed supply.

BLM must also commit to re-seeding of natives in subsequent years, if initial seeding attempts are not successful due to drought or other factors. This must be factored into any

No Need to Seed Herbaceous Species in Many Higher Elevation Sites

Many higher elevation sites require NO seeding of herbaceous species post-fire. Only sagebrush or other native shrubs should be seeded in these lands. It is essential, however, that these sites receive adequate rest from livestock grazing so that understory components, including

microbiotic crusts, can recover – this is essential to prevent new weed invasion. The two grazing season's rest is not sufficient.

BLM claims it may reseed or replant areas with "desirable" vegetation when the plant community cannot receive and occupy the site sufficiently. BLM provides no methodology or protocol used for making such determinations.

Livestock Trespass, Other Post-Fire Non-Compliance: As part of this NEPA process, BLM must review records of livestock trespass or non-compliance, and assess its frequency and impacts to treatment outcomes. What are the impacts of trespass on outcome of rehab efforts? BLM must also provide strict penalties for post-fire trespass by livestock on burned areas. As taxpayers often have spent hundreds of thousands of dollars on post-fire rehab and other ESR activities, accountability and effectiveness of rehab is essential. Please describe how trespass may harm any site recovery. For example, trespass has been a tremendous problem in Burley BLM lands, and documented by Miriam Austin of WWP and others over the years. The trespassed public lands at Rice Canyon and in the Goose Creek watershed of Burley BLM provide a perfect example of BLM Post-fire failures to control livestock.

Livestock Facilities: Post-treatment actions/EFR must sharply limit the use of federal fire funds in construction of post-fire livestock facilities. BLM's typical response to fire/treatment is to place a fence, often permanent, around the perimeter of the disturbed area, and often to develop additional water facilities outside the fenced/treated/burned area. These actions (fences that often become permanent, new water facilities) are NOT part of post-fire/post-treatment rehab, they are part of livestock management on surrounding lands. Such projects inflict, in an unplanned and unnecessary manner, a new array of disturbances to wildlife habitats already impacted by fire disturbance. Existing pasture fences should be used, and new fences should not be built.

There are many harmful impacts of barbed wire fences and other livestock facilities – posts serve as perches for predators, observation points for brown-headed cowbirds. Plus, fences cause avian mortality from collisions. New water sources lead to rapid disturbance and depletion of lands in the areas surrounding them, placing additional stress on native ecosystems and dependent species.

WWP strongly supports using existing unburned pasture or allotment boundary fences as the structures that restrict livestock from burned or treated lands. By closing these somewhat larger land areas to livestock grazing, BLM will also provide some better grass cover and habitat for species like sage grouse, that face habitat loss and fragmentation as lands burn. A 4-5 year closure of the pasture or allotment will result in ungrazed areas that help to provide grasses of sufficient height, or other necessary habitat components, for sage grouse and other native wildlife. Only temporary facilities should be allowed, if any are used at all – primarily electric fences. All post-fire rehab plans must specify removal dates for any livestock facilities that result from fire rehab activities. However, temporary electric fences have a long track record of failure – please review information in Burley and Challis BLM files concerning woeful trespass of burned areas or sensitive riparian areas that resulted from the use of temporary fences, rather than

removing livestock to existing pasture or allotment boundary fences .

AUMs Should Not Be Shifted Elsewhere: BLM should not shift AUMs from treated lands to other areas. All AUMs from burned lands should be placed in temporary suspension until rehab, or restoration, success occurs.

Regrettably, in some recent post-fire documents, BLM has merely been shifting livestock use elsewhere, and thus impacts of livestock on watersheds, wildlife, habitat, etc. are magnified and amplified to the detriment of native species and the ecosystems upon which they depend. BLM has never assessed the impacts of these shifted AUMs.

Area of Rested Lands Must Provide Habitat for Native Wildlife: BLM must protect land areas sufficient to provide habitat for sustaining viable and healthy populations of native wildlife as part of all treatment or ESR activities and decisions. This is particularly important for declining shrub-steppe species that are facing accelerated habitat loss and fragmentation (Knick et al. 2003, Connelly et al. 2004). BLM must assess the status of populations and habitats within the larger landscape area, and determine the likely effect of a fire on special status species and other important biota. BLM must also act to take protective measures – not only on the fire-affected allotments, but also on surrounding lands, and to buffer habitat loss until the habitat that has been lost can be restored.

Watersheds/Water Quality: Resting sufficient areas – burned and unburned, treated and untreated - is essential for watershed protection.

Risk Assessments: BLM must conduct assessments of the risks of seeding failure/loss, increased depletion, weed invasions, under various post-treatment grazing strategies and across a broad range of alternatives. What are the risks of seeding weakening and depletion if grazing is allowed to resume too soon?

Minimal Use of Chemicals: BLM must strive to minimize use of chemicals in wild land settings. An increasing segment of the public has health problems related to chemical sensitivities. Chemicals may leach into water, blow on eroding soils into other sites. Wind erosion is far more significant in post-fire environments, as dark bare soil surfaces heat up, with the result of funnel-cloud erosion/dustdevils blowing soils away. Cancer, respiratory problems and many other human health effects of herbicides and other treatment chemicals are well-known.

If BLM chooses to use chemicals, the treated lands, and surrounding areas, must be posted with signs IN ADVANCE that warn the recreational public of chemical use and possible exposure. BLM's disastrous use of Oust demonstrates the uncertainty associated with use of chemicals in wild land settings, where wind erosion or water runoff may transport chemicals to unintended areas with unintended consequences.

Periods of Rest: BLM must require adequate periods of rest from all livestock grazing to ensure that full recovery, or establishment of seeded vegetation, occurs. This time period is much longer than BLM ever requires, and is often dependent on the condition and health of vegetation

communities pre-fire. Eddleman et al. (1994) described 4-5 year periods of rest as necessary for degraded western juniper communities.

Low elevation sagebrush-steppe communities may require a decade or more, and repeated seeding efforts during periods of favorable weather, to allow re-establishment of native vegetation. The EIS plan must address these necessary periods of rest, and not base its actions on the convenience of the livestock industry.

Commitment to Rehab. Time periods sufficient to achieve adequate and healthy native vegetation communities, must be mandatory. A reasonable time period would be 5-10 years, given the vagaries of weather and drought cycles in depleted arid low elevation lands.

What About Restoration? "Rehabbing" in the BLM sense, is vastly different from restoration to a full component of native vegetation and ecological processes. Under what circumstances will BLM undertake Restoration?

Analysis of Past EFR/Rehab/Restoration Actions. As part of this NEPA process, BLM must assess all its post-fire rehab herbicide use efforts and seedings in the past 30-40 years, or however long records have been kept. For example, which cwg seedings in the Jarbidge were planted, when? With what species? What is their current condition?

Following this, BLM must collect site-specific data on the current condition, health, wildlife, recreational and other values of these areas seeded post-fire. How many new fences, pipelines, troughs, etc. have been built using ESR funds, or federal fire funds? What impacts have they had? A complete analysis must be presented in this NEPA document.

Economics: A complete analysis of the costs and benefits of spray/treatments must be provide. What is the per-acre dollar cost of all actions under all alternatives? What are the ecological costs/benefits of these actions?

BLM must also assess impacts of poor pre-fire land conditions and management on the outcomes of any post-fire recovery, and of the likelihood of success of any post-fire rehab.

We believe you must provide extensive analysis of the impacts of post-fire "salvage" logging or thinning. Is that contemplated under this EIS/PER? If so, what are its impacts to soils, vegetation, weed invasion risks, wildlife habitats, fisheries, recreational and other uses of the affected lands? What have been the impacts to, and what is the condition of, lands where this has occurred in the past?

Sincerely,

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To <orvegtreatments@blm.gov>
cc
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Subject Oregon Weed EIS

November 20, 2009

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Dear Oregon BLM,

Here are comments of Western Watersheds Project (WWP) on the Oregon BLM EIS "Vegetation Treatments Using Herbicides in Oregon DEIS". We believe that many of WWP's comments on the preceding and linked BLM 17 States Weed EIS and PER process are directly applicable here to the Oregon effort.

WWP is greatly concerned that this EIS for 15. 7 million acres of BLM lands follows on the heels of the woefully deficient BLM 17 States Weed EIS and PER. That EIS was accompanied by a "PER" document that laid out plans to massively "treat", alter and destroy large expanses of woody vegetation across the western public lands. Yet the EIS never analyzed the full direct, indirect and cumulative effects of such massive treatment across public lands as a whole, or in each state, or on each important and sensitive species like sage-grouse and its populations and habitats.

BLM has never, to this day, fully examined the large-scale manipulation and purposeful destruction of native vegetation that it described in the PER and that it is busily conducting across Oregon, Nevada, Idaho and much of the West. BLM – as in the Burns and Lakeview offices of BLM – has been conducting large-scale destructive "manipulations" – with use of fire, mowing, and other disturbance that fosters and promotes weeds. The full scale of these actions and the direct, indirect and cumulative adverse effects across landscapes, across the range of ESA and sensitive species like sage-grouse or pinyon jay, across important public recreational areas and little-roaded or little-fragmented areas has never been examined. The Oregon EIS now continues these failures. Several of the RMPs under which these destructive weed-promoting actions are being carried out have been challenged (both in Oregon and across the West), and the shoddy manipulation treatment analysis and the great scale and harmful "invasiveness" of many of the "treatments" described in the PER and promoted in the RMPs is part of these challenges.

It appears to us that this EIS is being conducted partially because of the scale of the massive "treatment" disturbance to sagebrush communities and juniper communities in Lakeview, Burns

and other areas, BLM's continuing grazing disturbance on top of treatment or wild fire disturbance in nearly all areas, and the general pattern of greatly abusive livestock grazing (overstocking of depleted and desertified lands, harmful seasons of use, minimal to no required annual measurable standards of livestock uses) as occurs in Vale BLM Louse canyon and other many other Vale areas, and Lakeview and Burns BLM, that BLM is increasingly relying on dangerous herbicides.

BLM's Oregon Weed EIS proposes to radically increase herbicides use in Oregon and Washington state (?)– from 4 herbicides to 18 of these dangerous substances– with many of the 18 posing very significant risks to the human environment. It again fails to examine a broad range of alternatives and passive and other carefully targeted treatments to minimize herbicide use and conduct truly integrated weed management. Many have cumulative impacts, many have only been tested to any degree by the chemical companies that sell them – and then not in remote windy wild land settings and not on sensitive wildilfe or aquatic biota in degraded habitats like the overgrazed BLM Oregon lands. This all results in disastrous outcomes of BLM treatments - like occurred with Oust.

For example, how many of these hazardous chemicals have been tested in situations where winds blow cattle-trampled and de-stabilized herbicide-encrusted soils into waters? Onto migratory birds eggs? Into pygmy rabbit burrows as well as on the vegetation that pygmy rabbits eat?

Precaution Not Really Considered

From Wikipedia: The precautionary principle is a moral and political principle which states that if an action or policy might cause severe or irreversible harm to the public or to the environment, in the absence of a scientific consensus that harm would not ensue, the burden of proof falls on those who would advocate taking the action.[1] The principle implies that there is a responsibility to intervene and protect the public from exposure to harm where scientific investigation discovers a plausible risk in the course of having screened for other suspected causes. The protections that mitigate suspected risks can be relaxed only if further scientific findings emerge that more robustly support an alternative explanation. In some legal systems, as in the law of the European Union, the precautionary principle is also a general and compulsory principle of law.[2]. The EIS fails to analyze any impacts of any alternative that would deal with integrated weed management, passive and some active restoration to address weed infestation on BLM lands.

Degree of Risks of Herbicide Use in Wild Lands Are Being Recognized All the Time

A recent federal court hearing and trial in Boise over Oust has exposed just how slipshod many of the chemical company claims of the supposed benign effects of herbicides really are. Yet BLM, in a zeal to continue to allow all manner of disturbances that promote the weeds that then the agency needs to treat, allowed use of chemical that poisoned crop fields when it "drifted" - i.e. was transported on the wind. In the disturbance public wild lands subject to heavy grazing use across nearly all BLM lands east of the Cascades, such erosion and "drift in wind and water – including on soil as occurred with Oust can be viewed as common. Instead of using the outcome

of the Oust trial as a cautionary tale, BLM seems to be plunging ahead to repeat more of the same past mistakes.

Here is a recent news article on the impacts of drift and the outcome of BLM relying largely on the assurance of the chemical company "pushers" of herbicides.

http://www.idahostatesman.com/531/story/793848.html

Hundreds of farmers face BLM in lost crop lawsuit
By REBECCA BOONE, Associated Press Writer
Published 06/06/09

BOISE, Idaho — When his beets came in patchy, pushing through the soil with misshapen and discolored leaves, Perry Van Tassell did what most farmers would do.

He watered more.

And more. And more.

"They looked like they were thirsty," said Van Tassell, who farms outside the small southern Idaho town of Paul. "They looked like they were in a frozen state."

It was 2001, and Van Tassell, like most farmers, had hundreds of thousands of dollars invested in his crops. His corn fields stood shorter than his toddler son when they should have been stretching 12 feet high.

He came to believe his land had been tainted with Oust, a potent herbicide that kills plants by attacking their roots and leaves.

The pesticide had been spread across more than 100,000 acres of nearby public land at the direction of the Bureau of Land Management, which was hoping to prevent the spread of invasive weeds on land that had been scorched by wildfire.

But no rains came to melt the herbicide into the soil. The wind picked up. And Van Tassell and more than 130 other farmers - stretching from Paul east to Aberdeen - claim the powdery herbicide blew across their crops, leaving them with warped plants, barren soil and millions of dollars of debt.

Now a federal jury will decide if the federal government or herbicide maker E.I. du Pont de Nemours and Co. is to blame for their misfortune.

Beet leaves are supposed to open to the sky, spreading out from the center of the plant. The farmers say most of the beet seeds they planted never grew, and the ones that did were small, with leaves that pointed upward and were shaded purple instead of green.

Hay, potatoes, corn, wheat and other crops were also badly affected, the farmers claim.

Van Tassell, who runs a dairy in addition to his farm, used to grow corn and hay to feed his cattle. On Monday he showed pictures to a federal jury of how his crops looked in those years.

"You could see some hay was growing through, but only in strips," he said. "You'd get maybe 15 to 20 percent of the plants that would grow."

By fall of 2002, so much dirt was blowing off the Oust-treated land near his farm that his hay bales were contaminated with dirt.

"We were scared to feed it to the cows," he said.

He pressed DuPont, the maker of Oust, for information on the safety of his crop. They sent him a study showing that feeding hay grown after Oust application was safe for lactating cows. He decided to chance it with after Kraft Foods assured him they would still buy his milk, Van Tassell said.

Van Tassell and the rest of the affected farmers - more than 130 of them - filed a federal lawsuit against the USA, DuPont, Thomas Helicopters (the company that applied Oust from the air) and De Angelo Brothers Inc. (the company that applied the Oust from the ground). But Thomas Helicopters and De Angelo Brothers reached a settlement with the farmers last fall.

Charles Miller, spokesman for the civil division of the U.S. Department of Justice, said he couldn't comment on the lawsuit. Heather Feeney, a spokeswoman for the Bureau of Land Management in Boise, referred all requests for comment to Miller.

The BLM issued a statewide moratorium on Oust in 2002. BLM officials refused to tell The Associated Press whether that moratorium still stands, citing the lawsuit.

Dan Turner, a spokesman for DuPont, said in a prepared statement that the complaint is without merit.

"The Idaho State Department of Agriculture has already investigated this situation and did not find DuPont to be at fault," he said, maintaining that Oust meets global safety standards when used according to the directions.

DuPont has maintained that the BLM and its contractors "did not follow instructions when applying the herbicide. The BLM, meanwhile, points fingers at DuPont. BLM officials said in 2002 that a prolonged drought caused the situation, and that the herbicide was applied correctly.

The trial began May 4 and is expected to last up to four months.

Plaintiff Tina Clinger of American Falls grew up in the rural region and married into a family of beet farmers. She and her husband, Jerome, bought land near his parents to start their own farm.

She handles the books, drive an 18-wheeler during harvest, and taught her children to hoe the weeds from between the tidy rows of plants.

At the trial, she described plantings in 2000, 2001 and 2002 that failed to thrive.

"This is not a good-looking field," Clinger said as the jurors were shown a picture that contained far more dirt than plants. "This is a field that makes you want to cry."

To break even the farm has to yield 25 tons of sugar beets per acre, Clinger said. It yielded 23 tons per acre in 2000, 19 tons in 2001 and 20 tons in 2002.

The crop failure was devastating to her family. Because her father-in-law had recently had heart surgery, Jerome Clinger was working both farms. He quit sleeping and lost weight. They argued, their strong marriage fraying under the pressure. The children worried their parents would divorce, she said, fighting tears.

Her father-in-law's dream of owning his land outright was destroyed in the span of two seasons.

"My father-in-law was 73 at the time and he had one payment left on his farm," Clinger said. "We went into arrears so bad that he had to refinance the farm. Thirty more years."

In 2000, the Clingers had $1.5 million in operating loans to cover normal farming expenses, including $20,000-per-month summer power bills for running the irrigation pumps. They'd planned to pay the loan back with the profits from the beet harvest, as they did every year. Instead they had to extend the loan, refinance, borrow additional cash. The debt continues to grow, she said.

"Now it's $2.3 million," Clinger said.

BLM here, as with the BLM Amme 17 States Weed EIS effort, ignores actions such as passive restoration and a truly Integrated Weed Management Approach. It fails to address and require common sense actions on public lands to limit site disturbance or reduce weed transport. Instead, BLM seeks to impose expensive and dangerous chemicals – with all their degradates, contaminants, carriers, active ingredients and impurities. These then would be used either alone or mixed together n various combinations in an unexamined brew of poisons for which NO research has ever been conducted. Of course, little to no study of the combined effects of herbicides has been conducted. Nor of the effects of repeated use in the same area – as in common with livestock-degraded weedy sites like artificial upland water sources, springs, seeps ad wet meadows, salting sites, etc.

Primary reasons for the need to use herbicides on BLM lands are:

1) The historic, ongoing and chronic effects of domestic livestock grazing disturbance and associated management actions and associated weed-producing disturbances including facilities that intend and intensify livestock use and promote a large road network across the lands they impact and degrade through concentrating and intensifying livestock use.

2) Road networks that have been allowed to grow up, unplanned, over time. Often in

association with livestock facilities or management activities such as salt placement on ridges.

3) BLM vegetation treatments designed to kill native woody vegetation and/or increase livestock forage – such as sagebrush or juniper.

4) The indirect, synergistic and cumulative impacts of the above.

We are including comments similar to those that we provided on the previous EIS to you for this Oregon effort.

Oregon BLM (Burns District, Lakeview) has recently conducted massive manipulation of the public lands. Many of these grazed areas areas are very vulnerable to accelerated weed spread with any added disturbance. They are already ecologically compromised by continued high levels of livetock grazing on top of past treatments now new treatments and other disturbance. The use of herbicides described in the 17 States and this Oregon effort to try to stop this weed response to multiple overlapping disturbances. BLM treatments, post-wildfire grazing disturbance, and normal grazing schedules occur with minimal rest from livestock grazing. Passive restoration is truncated, and weeds thrive in bare soil areas, depleted vegetation community understories, etc.

We can find no info in the Oregon EIS on the current ecological conditions of the affected lands – poor, fair, good, presence of cheatgrass, areas of cheatgras dominance in understories, near-complete weedlands as areas near Owyhee Reservoir, mapping and analysis of areas of Oregon public lands that are vulnerable to cheatgrass and other weed spread with continued livestock disturbance/risk of invasion/expansion with continued grazing disturbance, etc. The EIS fails to provide criteria and alternatives that would "manage" and "treat" areas with small amounts of cheatgrass or that are at great risk of its expansion by removing grazing or other intensive disturbances.

The EIS does not provide a current analysis of the info that is needed to understand the scale, amount and volume of each type and combinations of chemicals that will be applied under all alternatives. Comparisons must be made with a minimal disturbance alternative based on the Precautionary principle.

There is also no summary do livestock-disturbed acres, miles of fences, miles of pipelines, troughs, livestock facility roads, road density, etc. in relation to infestations or risks of infestations. All this is necessary to understand weed conduits.

There is no analysis of the FRH assessments, current ESI (Ecological Site Inventory) that is necessary to provide a baseline of current land condition and thus understanding of risk of weed expansion/dominance and amount of herbicide use that may be occurring. The Oregon RMP's largely relied on decades old data. Case in point: SEORMP and its rosy claims about land health based on 1980s info. ESI other info necessary to understand the current ecological condition and health of the lands, and the adverse effects of livestock grazing disturbance on them. This also provides a basos for understanding the severe effects of grazing, and BLM treatment disturbance,

in promoting desertification and amplifying the effects of climate change.

Not only was there no analysis of the adverse effects of the large-scale veg treatments in the 17 States EIS, there was no adequate consideration of the tremendous cumulative ompacts of the explosion of proposed wind energy, geothermal energy, transmission lines, the Ruby gas pipeline and many other proposed or very foreseeable activities that will result in large-scale disturbance, roading, soil erosion, degradation of watersheds, and allow for significant inroads to be made by invasive species, especially in chronically grazed landscapes. This all will inevitably prompt BLM to douse public lands with herbicides. The Oregon EIS must provide detailed analysis of all of this new and additional disturbance, and the ramifications for herbicide use.

SOME COMMENTS RE: Livestock, Weeds, Treatments/Disturbance

The EIS Vegetation Treatment on BLM Lands in 17 Western States, the associated PER, Biological Risk Assessments and other documents did not adequately examine the direct, indirect, synergistic and cumulative effects of use of these chemicals and the risks of increased ecological problems especially associated with continued disturbances such as livestock grazing and new disturbances such as treatments. Neither does the Oregon EIS. Our comments include concerns about the lack of adequate data and analysis on the current environmental setting – including degree of severity of desertification and degradation of watersheds; chronic livestock and grazing management impacts; current baseline information on wildlife species (including many special status and other declining species) focused on habitat loss and fragmentation of habitats and populations across native vegetation communities targeted by the EIS for large-scale treatment.

The EIS lacked critical data and analysis necessary to assess the environmental impacts of the herbicide use and the massive array of wild land disturbance treatments proposed – chaining, fire, mowing, cutting, chopping, herbiciding and potential biomass export.

Unless the environmental setting in which the herbicide use and continued land use disturbances such as grazing and veg treatments would occur are fully revealed and assessed based on sound ecological and Best Available Science, BLM can not develop a reasonable range of alternatives, nor apply adequate analysis of impacts of the proposed action under any alternative. Nor can it ensure that the public lands, waters and native biota will de protected from unnecessary and undue degradation.

The **gross deficiencies** of the EIS/PER and associated analyses are illustrated in the cursory, limited, and scientifically invalid discussion of "Impacts of Herbicide Treatments on Wildlife and Habitat by Ecoregion", EIS at 4-106. As an example, in its limited and myopic analysis of wildlife effects of herbicide use and ignoring of the role of livestock grazing, EIS at 4-106 states *"long fire intervals have created decadent, climax sagebrush communities that dominate large areas of public lands. These communities have lost their perennial herbaceous understory as a result of competition from sagebrush"* . The EIS then proceeds to blame sagebrush for cheatgrass invasion. These sweeping assertions indicting sagebrush and blaming old or mature sagebrush for cheatgrass invasion are based on one obscure citation (Perryman et al. 2003). This Perryman et

al. citation (Perryman is an outspoken proponent of the public lands livestock industry in Nevada) is nothing more than an **opinion piece**. EIS at 6-28 shows the citation as: Eastern Nevada Landscape Coalition Position. Rangelands 25:30-34. Now the Oregon Weed EIS largely continues in this vein and fails to provide the in-depth analysis of the effects to many important and sensitive species habitats and populations. The adverse impacts of methods and scale of herbicide application are also not addressed.

It is precisely the old growth or mature native plant communities such as the sagebrush that are critical for persistence of a great many species of native wildlife across the lands where treatments are targeted Knick et al. 2003,Welch and Criddle 2003, Connelly et al. 2004, Dobkin and Sauder 2004); that it is disturbance by livestock or other human uses and not sagebrush that is causing any understory problems that may exist; and that it is precisely the loss, fragmentation and degradation of mature and old growth native vegetation communities due to human uses and BLM management paradigms identical to those of the proposed "treatments" that have caused the weed problems the EIS's are supposed to be addressing.

Desertification and Watersheds

There is an extensive body of scientific literature on desertification of watersheds, including in the western United States. Desertification is defined as: "a change in the character of the land to a more desertic condition", involving "**The impoverishment of ecosystems as evidenced in reduced biological productivity and accelerated deterioration of soils** and in an associated impoverishment of dependent human livelihood systems". See Sheridan 1981, CEQ Report 1981 at iii. Major symptoms of desertification in the U. S. include: declining groundwater tables; salinization of topsoil or water; reduction of surface waters; unnaturally high soil erosion; and **desolation of native vegetation** (Sheridan CEQ at 1). The existence of any one can be evidence of desertification.

As lands become desertified due to human disturbance such as chronic livestock grazing and trampling impacts to soils and vegetation, they become **less productive**, and activities such as livestock grazing become **less sustainable**. Continuing disturbance activities like livestock grazing while imposing a new aggressive treatment disturbance regime, may have drastic consequences, and push more sites across thresholds from which they can not recover. Plus, treatment disturbance may result in grazing becoming even less sustainable across the landscape. In many BLM lands, because of desertification and degradation processes that have already occurred, have already crossed the threshold between sustainability and, essentially, "mining" of increasingly **non-renewable** natural resources.

Desertification can be both a patchy destruction, often exacerbated by drought, as well as **the impoverishment of ecosystems within deserts**. The EIS must assess the levels and degree of desertification that have occurred across the Oregon EIS area. This is necessary to understand the likelihood of soil erosion, accelerated runoff, and other forms of drift, and to understand the amounts of chemicals likely to be applied over time. This is necessary to understand the capability and suitability of these lands for livestock grazing, the productivity and carrying

capacity of these lands for grazing, the current or likely future extent of cheatgrass and other hazardous fuels problems linked to desertification and livestock or other degradation, the need for treatments and the type of treatments that may best be applied, the risks associated with treatments, and the likely effectiveness or success of any treatments undertaken under the EIS. The effects of alternatives, their ability to meet any objectives, and the ability of actions under the EIS to maintain, enhance or restore habitats and populations of special status and other important species and native plant communities depend on the current environmental conditions of the lands where they would be applied. For example, how has the extensive depletion of understories in many areas of Wyoming big sagebrush vegetation or western juniper affected the degree and rate of desertification processes across the EIS area, and altered the potential of a site to recover from any treatment disturbance that may be imposed? How has this depletion affected livestock patterns of use, acres per AUM, invasion of hazardous fuels like cheatgrass, increased densities of woody vegetation, etc.? What are the acres per AUM across vegetation types at present, and how do they compare to stocking rates of good or better ecological condition communities? How many acres per AUM are required to sustain cattle or sheep in the lower salt desert shrub or Wyoming big sagebrush communities, and how does this compare to current stocking rates on these lands? How does this all factor into understanding the amount and kinds of herbicides to be used in Oregon – and the risks to native biota?

All BLM grazing, treatments, energy projects, etc. have the potential to disturb native vegetation, soils, and watersheds, and open the door for accelerated erosion and further loss/desolation of native vegetation, i.e. accelerate desertification.

Degraded communities are extremely vulnerable to weed invasion --- especially with chronic grazing or motorized disturbance. As chronic grazing, roading (often linked to livestock facilities or management and other disturbance continues: Livestock and vehicles assist the spread of weeds via mud trapped in hooves and tires and/or on hides; Livestock transport weed seeds in their digestive systems, spreading them across the landscape in manure; Livestock trample soils and vegetation, and vehicles churn soil and smash vegetation, facilitating weed establishment; Livestock crush and trample microbiotic crusts that may inhibit weed establishment; Livestock may selecting native species over exotics, providing a competitive advantage to invasive species by eliminating competition with native species; Livestock can alter landscape variables (such as fire regimes) giving advantages to exotics. (Belsky and Gelbard 2000, Gelbard and Belnap 2003).

BLM has failed to assess the combined effects of desertification, livestock grazing and exotic species/weed increase and infestation in its weed treatment analyses.

Even PRIA acknowledged that production on many BLM lands was below potential, and would decline even further. BLM's typical Grazing Permit EA and rangeland health analyses largely ignore chronic grazing as a cause of weed invasions and any need for treatment. The EIS ignores adequate consideration of any actions/treatments that could lessen the impacts or severity of grazing disturbance. The current crop of Oregon Land Use Plans developed in the Bush era largely continue the current level of grazing while interjecting or superimposing massive treatment disturbance. This will ultimately result in even further loss of soil, microbiotic crusts, water, watershed integrity, wildlife habitat, and forage across the arid West.

Desertification symptoms in arid lands include: Sparsity of grass; presence of invading plant species - both native and non-native, in grass areas that have survived: plants are of poor vigor; topsoil losses - in many places, topsoil is held only by pedestals of surviving plants. Surface signs of soil erosion include: pedestaling, gullies, rills, absence of plant litter to stabilize soils.

Desiccation and erosion caused by livestock can cause water tables to drop, rilling, gullying and arroyo cutting to occur, and result in sediment flow from degraded areas (CEQ at 14). Grazing creates extremely dry site conditions for plants due to removal of litter, loss of soil cover, and trampling of the ground that prohibits rainfall from reaching plant roots (CEQ at 15).

Livestock grazing exacerbates any climate changes and shifts that may be occurring (CEQ at 16). This is of particular concern in the arid EIS landscape periodically plagued with severe drought, and which is facing increasing heat and aridity due to global warming. Such effects must be fully considered if BLM is to understand the impacts of any alternatives, treatments, management actions or disturbance under the EIS.

The near-absence of many species of larger stature native bunchgrasses from many areas of the EIS lands, especially those of Nevada, Idaho, Oregon and Wyoming where many of the treatments are proposed, such as the diminished state of the once abundant Indian ricegrass or bluebunch wheatgrass, signals an ecosystem stressed by livestock grazing (CEQ at 19).

BLM must fully assess the extent and degree of desertification of the affected lands, in order to understand the effects of herbicide use or any treatments. Aridity, absence of plant litter or safe sites in (post-treatment environments, after fire, or with chronic grazing and trampling impacts) makes germination of native species more difficult. Recovery of lower elevation areas will be exceedingly slow, especially considering the aridity of the lands where most treatments are to occur. Arid land recovers very slowly; massive soil erosion has occurred in many areas and is still occurring; exposed soils are less able to support plant life because of lower organic content; and invader species have become well established and have the competitive edge (Sheridan CEQ at 21, Fleischner 1994).

Even though it is well recognized that "**the way to end overgrazing is to reduce the number of livestock in the end**" (Sheridan CEQ at 22), political pressures from ranchers results in strong political opposition to reduced grazing. Political pressures have hamstrung implementation of the Taylor Grazing Act and continue strongly to this day on BLM lands across the West. The EIS **does not** properly characterize the current setting, and never addresses the stress placed by current livestock numbers, or by BLM management paradigms aimed at retaining high stocking rates on arid land ecosystems to avoid political fallout. BLM fails to assess how stocking rates and management paradigms are out of step with current Best Available Science, and known impacts of livestock to soils and microbiotic crusts, and native plant communities. Example: microbiotic crusts and understory impacts: Anderson 1991, Anderson and Holte 1981, Anderson and Inouye 2001, Belnap 1995, Belnap and Gillette 1997, Belnap et al. BLM Tech Bull. 2001, Belsky and Gelbard 2000, Beymer and Klopatek 1992, Donahue 1999, Fleischner 1994 review article, Freilich et al. 2003. Example: Forage utilization levels and associated stocking rates

typically allowed by BLM greatly exceed those recommended even by current range science See Galt et al. 1999, Galt et al. 2000, Gelbard and Belnap 2003, Hockett 2002, Holechek 1996b, Holechek et al. 1998, Holechek et al. 1999 a and b, Holechek et al. 2000, Holechek et al. 2001.

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This Oregon EIS process provided BLM an opportunity to gain a better understanding of the actual capability and productivity of the vegetation and soils that meets the desires and needs of the public on these Oregon lands. It provided BLM an opportunity to conduct a real analysis of the risks of weed increase, spread and the futility of treatment of disturbances such as livestock grazing continue at or near current levels.

Sagebrush, western juniper, salt desert shrub and other vegetation communities show signs of extensive changes and significant stresses, with livestock grazing and aggressive non-native weeds recognized as among important causal factors. Inter-linked grazing disturbance, weed invasion and altered fire cycles cause native plant communities to cross thresholds from which recovery is very difficult, if not impossible. On top of these degraded conditions and chronic livestock disturbances, BLM's 17 states EIS and the current LUPs would impose massive new disturbance without addressing the current environmental setting and ecological realities across the landscape.

EIS Must Reveal the Current Environmental Setting

Current information on the perilous status of habitats for native biota across much of the project area highlights the need for BLM through the EIS/PER to conduct current surveys. Systematic and comprehensive survey and assessment of species presence, habitat presence and quality and degree of fragmentation is necessary to: 1) Understand current status of habitats and species populations and thus determine which lands may need treatment – including a full range of PASSIVE treatments such as reduction in stocking rates, closure of pastures or allotments, closure of roads; 2) Determine what type of treatments may be minimize site and habitat disturbance. Example: If high numbers of livestock are creating extensive soil disturbance and spreading weeds across wild land areas, then limiting livestock numbers and use must be a primary treatment method to limit weed spread. It has the least risk of new habitat fragmentation or new disturbance to native vegetation and soils that act to promote weed expansion; 3) Understand existing fragmentation before proposing to impose large-scale new disturbance that will further fragment habitats of species already declining from habitat fragmentation and disturbance.

Some of this information was already assembled at the time of the Weed EIS/PER. But its preparers largely ignored it. The Conservation Assessment for Greater Sage Grouse (Connelly et al. 2004) provided GIS maps and information on BLM lands and landscape-level fragmentation factors. The data used in this mapping included information, for example, cheatgrass presence in understories, livestock facilities, and many other factors fragmenting species habitats. Instead of providing necessary information and mapping based on the current information of this type be properly related to the proposed actions.

New assessments and analyses are available. See:

Ecology and Conservation of Greater Sage-Grouse: A Landscape Species and Its Habitats
>
A release of a scientific monograph with permission of the authors, the Cooper Ornithological Society, and the University of California Press
>
Twenty-four new chapters on sage-grouse and sagebrush habitat conservation.
>
Download chapters at http://sagemap.wr.usgs.gov/monograph.aspx
>

Please fully consider all of these Chapters in your analysis of the cumulative effects of herbicide use especially in degraded landscapes where potential for drift and killing of target species required by sagegrouse or other native species is significant. How might herbicides applied to kill leafy spurge in understories kill or wipe out sagebrush in the same area? We have observed this effect on public lands in Idaho. How might trampling disturbance to soils be livestock facilitate herbicide effects on target species?

We stress that many of these papers fail to adequately deal with the adverse impacts of livestock grazing and trampling disturbance – such as the examining the current scientific literature related to microbiotic crusts and their role on preventing invasions of cheatgrass or other weeds

The realities of the current ecological conditions and status of native biota across arid BLM lands, including in the face of climate change, must be fully addressed.

How might small, isolated populations of sage-grouse, pygmy rabbits or other native biota - declining native special status and T&E species in fragmented landscapes – be affected by herbicide use? What if spraying for weeds increases losses of sagebrush in critical wintering areas?

Dwindling Surface and Ground Waters, Shrinking Habitat Areas – Concentrate and Amplify Hazardous Chemicals and Contaminants

It is necessary to understand the degree of impacts to, and losses of, surface and ground waters across arid landscapes. This all has resulted in reduced perennial flows. This means remaining waters relied on by wildlife are more limited. Herbicides that are applied in these watersheds may be even more concentrated/wash into vital and scarce surface waters relied on by sage-grouse, home to rare springsnails, fish, mollusks, etc. In such degraded situations, these species also typically face sediment problems, algae blooms, etc. – all of which interact with herbicides to stress animals and populations.

Even worse, many small springs, seeps and meadows across grazed lands have thistle, henbane and other noxious weeds present. Their flows have been reduced by livestock-facilitated desertification and often by BLM "developments". Use of herbicides in and near areas with limited mesic vegetation and very limited water availability may have many adverse impacts.

Chronic Ecosystem Disturbance, Fragmentation and Imperilment of the Sagebrush Biome

The decline in sage grouse populations and other species dependent on arid land shrub habitats is a landscape-scale biological indicator that the loss of functions and values of sagebrush ecosystems are serious and widespread. These are also signs of desertification processes across the landscape.

The analysis, Dobkin and Sauder 2004,"Shrubsteppe Landscapes in Jeopardy: Distribution, abundances, and the uncertain future of birds and small mammals in the Intermountain West", examined bird and small mammal species in the sagebrush biome. The authors found that "very little of the sagebrush biome remains undisturbed", the **inherent resilience of the ecosystem has been lost and the ability to resist invasion and respond to disturbance has been compromised** (Dobkin and Sauder at 5). At least 60% of sagebrush steppe now has exotic annual grasses in the understory or has been converted completely to non-native annual grasslands (citing West 2000). More than 90% of riparian habitats have been compromised by livestock or agriculture.

The authors distilled a list of 61 species of birds and small mammals that are completely or extensively dependent on shrubsteppe ecosystems, and conducted an analysis of their distributions, abundances, and sensitivity to habitat disturbance to assess current state of knowledge and conservation needs of these species, with focus on Great Basin, Interior Columbia Basin and Wyoming Basin, based on BBS data and other studies.

The Columbia Plateau, Great Basin and Wyoming Basin are among the **least sampled** of all physiographic provinces covered by the Breeding Bird Survey. **Remarkably little** is known about the actual distributions or population trends of small mammals. "Range maps created by connecting the dots among sites where a species has been captured do not paint a realistic picture, especially in the highly altered and fragmented shrubsteppe landscapes of today. For small terrestrial mammals … our results support the view that many of these species now exist only as **small, disconnected populations isolated from each other … it is completely untenable to assume species' presence based on simply on presence of appropriate habitat in shrubsteppe landscapes of the Intermountain West**". Also, the authors "**find no reason for optimism about the prospects in the Intermountain West of any of the 61 species" (at 3). "The results of our analyses present an overall picture of an ecosystem teetering on the edge of collapse** (citing Knick et al. 2003)".

Thus, the aggressive "treatments" to be conducted under all BLM's 17 states EIS alternatives, are identical to the practices and treatments currently identified as causing species declines and habitat fragmentation in the first place! Now the Oregon EIS attempts t impose 18 chemicals to

deal with weeds mis-management of Oregon BLM lands is causing.

An untold number of livestock facilities (fences, spring projects, pipelines, trough systems salting sites, corrals, wells, windmills, water haul sites, etc.) have been constructed or placed on public lands – including across these allotments and surrounding lands. Roads almost inevitably grow up either as a direct result of facility construction/placement, or of continued facility use and maintenance. Then, roads become travel corridors for predators (Braun 1998, Federal Register 2003, Federal Register 2004, Connelly et al. 2004, Freilich et al. 2003, Connelly et al. 2004, Dobkin and Sauder 2004), and conduits for weed invasion (Gelbard and Belnap 2003). Many of these facilities have unforeseen effects, and exert influence over much larger areas than anticipated. For example, water developments may attract sage grouse predators and be "sinks" (Connelly et al. 2004).

Ecological changes have pushed many sagebrush landscapes beyond ecological thresholds for recovery. Cumulative effects of land use and habitat degradation are moving sagebrush habitats toward ecological collapse and dysfunction (Knick et al. 2003, Dobkin and Sauder 2004).

Sagebrush Mammal Summaries (based on Dobkin and Sauder 2004)

Eleven of 24 mammals in the report by Dobkin and Sauder (2004) are endemic to the IM West, representing a high degree of endemism. Many of the small mammal species whose status is reviewed in the report are important prey for raptors and some other special status species. In addition, the high degree of endemism is likely even greater than species-level ranges would indicate, and genetic analyses of upland and riparian small mammals may provide more examples of "cryptic" species like has now been found in endemic ground squirrels in Idaho.

Only one of the 19 species of small mammals for which adequate trapping data was available was found in more than 62% of potentially suitable localities. This analysis of field studies is the first comprehensive attempt to quantify presence or absence across a region. The report found that **21 of the 24 small mammal species respond negatively to the effects of livestock grazing. Eleven of 18 small mammal species responded negatively to the presence of exotic plants**, with riparian mammal species exhibiting neutral responses if vegetation was thick enough.

Geographic patterns of species richness and community stability raise concern. Despite range maps showing occurrence over broad areas, many species of small mammals now exist only as small, disconnected populations isolated from each other by unsuitable habitats." Thus, **it is completely untenable to assume species' presence based simply on presence of appropriate habitat in shrubsteppe landscapes of the IM West**." This demonstrates why BLM must systematically conduct non-lethal site-specific surveys for small mammals in representative habitat types, and assess habitat conditions, across the allotments.

The report authors conclude: We find **no reason for optimism** about the prospects in the Intermountain West for any of the 61 species identified. **Sagebrush distribution is highly fragmented, and much less extensive than large-scale maps suggest. Extraordinary**

fragmentation and degradation of sagebrush-steppe landscapes has been caused by livestock grazing practices, purposeful removal of sagebrush and/or seedings through prescribed fire, mechanical treatment, biological agents and herbicides, invariably done to provide forage for livestock, especially as native vegetation communities have become increasingly depleted, as well as ag-conversion, roads, mining and mining exploration fragmentation, powerline and pipeline corridors.
Although sage grouse have been the flagship species for this ecosystem, and publicity over concerns have focused mainly on grouse, it is not just sage grouse that are in trouble. Sage grouse have become a surrogate for numerous species of animals and plants that depend on sagebrush communities, and many of these species may also use salt desert shrub communities.

Shrubland and grassland birds, representing an important component of the biodiversity of the western United States, are declining faster than any other group of species in North America (Saab and Rich 1997, Paige and Ritter 1999, USGS Great Basin Mojave-Desert Region, Dobkin and Sauder 2004). Species dependent on sagebrush ecosystems (Brewer's sparrow, Sage Sparrow, Sage Thrasher) may be important predictors of ecological collapse.

A review of field studies of small mammal response to livestock grazing (compared moderately to heavily grazed upland or riparian areas with exclosures), found **overwhelmingly negative responses** (decreased abundance or productivity) to the effects of livestock grazing for 12 species (Table 8): Upland: Paiute ground squirrel, Washington ground squirrel, little pocket mouse, Great Basin pocket mouse, Chisel-toothed kangaroo rat, desert woodrat, sagebrush vole, Riparian: Water shrew, Western harvest mouse, long-tailed vole, montane vole, western jumping mouse. 9 species have an extremely high likelihood for negative responses to livestock grazing (Table 8) are: Upland: Merriam's shrew, Preble's shrew, pygmy rabbit Idaho ground squirrel, Merriam's ground squirrel, Townsend's ground squirrel, Townsend's pocket gopher. Riparian: Townsend's pocket gopher. Plus, negative responses to presence of exotic species have been demonstrated for eight upland species, and can be inferred with high likelihood for three others.

Virtually no areas in the Intermountain West exhibited much riparian species diversity. For riparian birds, areas of highest species diversity were areas of **highest community stability**.

Patterns of high mammal species richness were concentrated within the three primary shrubsteppe ecoregions. Species richness was high in much of the Great Basin. Remarkably little is known about the actual distribution or conservation status of small-mammal species – there is no standardized survey. Alarmingly, there was **a high frequency in which species were missing from studies focused on suitable habitat.**

This should raise concern about the current actual extent of populations. It must be understood in the context of the high degree of fragmentation and altered disturbance regimes (Knick et al. 2003), the **"overwhelmingly negative response to livestock grazing",** and the limited dispersal capabilities of small mammals (Dobkin and Sauder 2004). **"Our results support the view that many of these species now exist as small, disconnected populations isolated from each other by unsuitable habitats across which they cannot disperse".** Catastrophic decline of the largest population of northern Idaho ground squirrels illustrates this. The **combined effects of**

altered fire cycles, (loss of fire here - as this species occurred in meadows in forest), **livestock grazing and exotic species introduction is the reality faced by many small mammal populations**.

Many species of small mammals exist as scattered, disconnected populations. One cannot assume species presence based simply on presence of appropriate habitat in shrubsteppe landscapes of the IM West.

Vole populations isolated from each other and tied to the riparian habitats among isolated mountain ranges are likely candidates for endemism to be found if genetic analyses are conducted. Several isolated subspecies of montane vole occur along the southernmost portion of the species range - likely isolated from conspecifics for millenia. Endemism among small mammals of the IM West, already high, is likely even greater. Many of the species have two or more described subspecies, and much of the described subspecific variation is based on morphological variations. Where thorough genetic analysis is conducted, there may be sufficient evidence to warrant elevation to full species.

A pattern of high species richness is much more concentrated for small mammals, and the number of endemics may represent more habitat specificity. The authors note that very little attention is paid to conservation needs of small mammals. Conservation efforts should integrate areas of high species richness for birds and mammals.

Across the IM West, **altered fire frequencies combined with ubiquitous grazing drives the loss of native plant community structure and composition on which birds and small mammals depend.** Grazing reduces competition from native grasses, and cheatgrass and other weeds flourish, with each successive fire promoting invader expansion, resulting in self-perpetuating monocultures of exotic plant species with very short fire return intervals (Whisenant 1991, Anthony and Vitousek 1992, Billings 1994, Knick et al. 2003). Exotic plant dominated landscapes are uninhabitable for nearly all native bird and small mammal species (Dobkin and Sauder 2004). Shrub-steppe habitat has diminished greatly - at least 44% of potential habitat for Greater Sage-Grouse has disappeared (Schroeder et al 2004) and this study did not evaluate fragmentation of the rest!

Biome-wide, accelerated Oil and Gas development is occurring in Wyoming. This places landscape-scale fragmentation and soil disturbance on an even faster trajectory. Also, an astonishing number of fences and other livestock projects that serve to also fragment habitats are found across the sagebrush biome (see Connelly et al. 2004). Now large-scale renewable energy is proposed to destroy and fragment important sage-grouse and other habitats on BLM lands in Oregon.

Sagebrush Bird Species Summaries (Dobkin and Sauder 2004)

There were significant declining trends for 16 of 25 upland bird species (64%) in the regions of the Intermountain West (Dobkin and Sauder 2004). Only 3 species showed a significant increasing population trend. 5 of 12 riparian species declined significantly over both the short

and long term. "Birds that depend on native vegetation for their nests clearly are jeopardized by the loss or degradation of vegetation. Nearly all 25 upland species are obligate ground/shrub nesters, with 18 of the 25 species dependent on native shrubs for nesting and foraging.

Species richness for upland birds was concentrated in the three primary shrubsteppe ecoregions, with areas of highest species richness extending across the Columbia Plateau from southeastern Oregon to easternmost Idaho, the eastern two-thirds of the Great Basin, and southwestern Wyoming Basin. There was constancy in bird species composition in upland bird communities between 1968-1983 and 1984-2001. However, the community \composition of riparian bird communities varied substantially between periods, with a **decrease in species composition of riparian communities**. Plus, ecologically unsuitable habitats are now embedded in matrices of suitable habitats.

The upland bird species, and all the riparian species listed in Dobkin and Sauder (2004), Table 1 at 9 occur in the EIS Project area, and the small mammal species found in Table 2 at 10 are likely to occur in the Project area. For some species, such as loggerhead shrike, declines were especially severe in the three primary shrubsteppe ecoregions – with population losses across large geographic areas.

Geographic **patterns of species richness for birds found that areas of highest upland avian species richness correspond with areas of lowest shrubsteppe fragmentation**. Bird species "Entirely" dependent on sagebrush: Greater Sage-Grouse, Sage Thrasher, Brewer's Sparrow, and Sage Sparrow. Birds "Nearly" dependent: Gray Flycatcher, Gray Vireo, Green-tailed Towhee, Black-throated Sparrow.

BLM's 17 States EIS and Oregon Land Use Plan proposed "treatments" and herbiciding will INCREASE fragmentation (see also Knick et al. 2003, Connelly et al. 2004). These species reviewed by Dobkin and Sauder and their habitats and populations will only be increasingly harmed in the short, mid and long terms.

Riparian birds have distributions that extend beyond the IM West, as do riparian mammals. Given the relative rarity and ecological importance of riparian habitats within shrub-steppe landscapes, the **high degree of instability in riparian bird community structure** found in the report, reflects **the poor condition of riparian habitats** across the Great Basin, Columbia Plateau and Wyoming Basin ecoregions (Dobkin and Sauder 2004, citing Saab et al. 1995, Dobkin et al. 1998, Tewksbury et al. 2002, Krueper et al. 2003, Earnst et al. 2004) **and the dewatering of riparian zones** (Dobkin and Sauder 2004, citing Rood et al. 2003), causing damage to avifauna and habitats.

Poor riparian condition contradicts BLM claims in the 17 states EIS of improved conditions. BLM has not provided the methodology and data upon which its rosy assertions on ecological conditions in the project area are based. BLM provides no current data on Oregon conditions. It is our observation that many areas (such as in Vale BLM Louse canyon) continue to spiral downward in condition, and face expanded threats from cheatgrass and other wed invasion due to BLM mis-management, and failure to control livestock impacts. as well as efforts to expand

roading.

Upland Species - summarized from Dobkin and Sauder (2004) and others:

* Greater Sage-Grouse. Causes of Declines: Habitat destruction, degradation and fragmentation, altered fire frequency (both lower and higher), livestock grazing converting shrubsteppe to annual monocultures are Threats. Range "improvements" and West Nile virus are threats. See also Connelly et al. 2004, USFWS Interim Status Report (2008), new Sage-grouse analyses (USGS site 2009).
* Ferruginous Hawk. Open areas, isolated trees, and edges of pinyon-juniper woodlands are used for hunting perches and nesting. "Prey abundance, particularly jackrabbits and ground squirrels, is correlated significantly with the number of breeding pairs in an area and with reproductive success. (Dobkin and Sauder 2004, citing Jasikoff 1982 and Deschant 2001 b) (at 36). Habitat destruction and degradation are greatest threats, and directly influence prey abundance, important to reproductive success. Ferruginous hawks can be particularly sensitive to human disturbance (at 37).
* Prairie Falcon. Open habitats with moderate grass cover and low-growing sparse shrubs. Nest-site availability and ground squirrel populations are important factors in habitat selection. Activities affecting ground squirrel abundance, include livestock grazing, frequent fires, ag conversion, poisoning. Disturbance near nest sites (cliffs) can reduce breeding success.
* Burrowing Owl. Requires low vegetation and a suitable nest burrow. BOs may expand other species burrows, but do not dig their own. Excavation by ground squirrels, marmots and badgers is important in nest burrow availability. Threats are habitat degradation and destruction, and shrub-steppe degradation by livestock or ag conversion. Pesticides can reduce populations of insect prey and fossorial mammals. Badgers, coyotes, birds of prey and vehicle collisions may also be problems.
* Gray Flycatcher. Shrub-steppe, mountain mahogany and pj. In shrubsteppe, gray flycatchers are associated with tall, dense sagebrush. Chaining or burning of sagebrush and pinyon/juniper areas is known to eliminate gray flycatchers (at 46). It is parasitized by the brown-headed cowbird. Habitat fragmentation likely increases nest parasitism and predation rates.
* Loggerhead Shrike. Shrubsteppe, open woodland, field edges, and occasionally riparian areas. Presence and abundance in shrubsteppe is positively correlated with the diversity, density and height of shrubs. Population declines in Columbia Plateau and Great Basin.
* Horned Lark. May be susceptible to trampling, and affected by invasion of annual grasses.
* Sage Thrasher. Habitat destruction, degradation and fragmentation are threats, including activities that destroy shrub cover (**fire, chaining, herbicide**) eliminate local populations. Although authors note that livestock grazing may increase shrubs, livestock grazing also alters shrub structure, especially that of taller sagebrush or other shrubs which are areas where sage thrashers nest.
* Virginia's Warbler. P-j, mountain mahogany, mixed deciduous shrublands. Habitat destruction, livestock grazing.
* Green-tailed Towhee. Shrublands and disturbed coniferous zones. In shrubsteppe, its presence and abundance are positively correlated with increased shrub species diversity, shrub cover, and taller shrubs. Threats are habitat destruction and degradation – livestock grazing and frequent fire have impacted shrubs. Simplification of shrub cover results in population reduction or

elimination.
* Brewer's Sparrow. Its presence is positively correlated with total shrub cover, bare ground, taller shrubs, patch size, and habitat heterogeneity – and negatively correlated with grass and salt shrub cover. Large population declines have occurred the in Columbia Plateau and Great Basin. Cowbird host. Threats are habitat destruction and degradation. Activities that destroy shrub cover (fire chaining herbicide, etc). A cowbird host. Positive (increased shrubs – see previous comments about shrub structure) and negative responses to grazing.
* Vesper Sparrow. Inhabits short, patchy herbaceous vegetation, low shrub cover bare ground, forbs. Habitat destruction and degradation – frequent fires, in conjunction with invasive grasses, heavy livestock grazing (which increases shrub cover), and poor range conditions created by livestock grazing during drought increase rates of nest abandonment and failure. Cowbird host.
* Lark Sparrow. Threats are fire and livestock grazing converting lands to annual grass monocultures are threats.
* Black-throated Sparrow. Desert shrub, shrub-steppe, open pinyon-juniper. Correlated with moderate shrub cover, tall vegetation, shrub species richness, and dead woody vegetation. Drought reduces the number breeding attempts and clutch size.
* Sage Sparrow. Particularly associated with big sagebrush, or may be found in mixed shrub communities with greater shrub cover, abundant bare ground, sparse grass cover. Shows high site fidelity. Habitat destruction, degradation and fragmentation are chief threats, and are caused by frequent fire, livestock grazing, range "improvements" (shrub treatments, exotic grass plantings) – and these promote other impacts – predation and nest parasitism.
* Savannah Sparrow. It has been assumed that Savannah Sparrow populations benefit from conversion to annual monocultures. However, converted habitats may not be equivalent to native grassland habitats and may serve as population sinks.
* Grasshopper Sparrow. Livestock grazing degrades habitats. While benefits from natural fire, annual grass conversion resulting from fire is negative.
* Western Meadowlark. May be affected by fire.

Thus, for many of these birds, the very actions that BLM proposed under the 17 States EIS and PER are Threats, and when conducted in the past, have destroyed, altered and fragmented habitats. These threats (livestock grazing, herbiciding, chaining, fire, mowing and other alteration of sagebrush and other native vegetation communities) have not been honestly addressed by BLM in the EIS or PER, or the Oregon EIS at present. Since best Available Science recognizes them as Threats, (see also Knick et al. 2003, Connelly et al. 2004).

Other summaries of species trends support Dobkin and Sauder (2004). Many species with downward trends in population size are associated primarily or exclusively with shrub-steppe or riparian habitats. In shrub-steppe, this includes northern harrier, mourning dove, horned lark, loggerhead shrike, green-tailed towhee, vesper sparrow, sage sparrow (USGS Mojave-Great Basin at 33-51). Populations up in one area, down in another: rock wren, sage thrasher, Brewer's sparrow, black-throated sparrow, western meadowlark. Population sizes of mourning dove and loggerhead shrike, whose abundances are declining widely in western North America are also declining in the Great Basin. The preponderance of downward trends in shrub-steppe indicates continuing problems with the health of this community. In pinyon-juniper with a sagebrush and bunchgrass understory, species include common nighthawk, northern flicker, gray flycatcher,

mockingbird, chipping sparrow, and Scott's oriole (USGS Mojave-Great Basin at 33).

BLM's 17 states EIS and PER, by proposing profligate use of **non-selective** fire, chaining or herbicides in western juniper communities will kill shrubs, too. Nowhere does BLM provide a protocol for determining the best or most appropriate treatment methods to be used, or for avoiding old growth or mature plant communities. This is precisely the type of information and analysis that the 17 States EIS, and now the Oregon EIS, should have provided, but it has failed to do so.

Riparian species with downward trends: killdeer, violet-green swallow, warbling vireo, yellow warbler, lazuli bunting, savannah sparrow, song sparrow, yellow-headed blackbird, Brewer's blackbird. Downward trends in riparian species – are indicative of **continuing deterioration of riparian habitats** of the Great Basin (USGS Mojave-Great Basin at 34). Continued deterioration of riparian habitats in the Great Basin contradicts BLM's rosy claims of improvement.

BLM Ignores Conservation Strategies with "Spray and Walk Away" Approaches

Landscape-scale conservation is also a critical component of ICBEMP scientific assessments (see Wisdom et al. 2000). The EIS ignores ecological understanding of the landscapes where massive herbicide and disturbance treatments are proposed.

Across much of the 17 states project area, and all of the Oregon area, large browsers disappeared about 12,000 years ago. The largest ungulate was the pronghorn. Jackrabbits, cottontails, and rodents may have been the largest herbivores (Mack and Thompson 1982, Connelly et al. 2004). Microbiotic crust occurs in areas that are not, or lightly, grazed. As a result, livestock grazing and trampling impacts cause extensive, chronic and often irreversible harm to soils, vegetation and habitats of native species. This results in an alteration of composition, function and structure of plant and native animal communities (Fleischner 2004)

Salt desert communities: Invasive species have impacted shadscale and greasewood communities, and have altered their composition and function. Livestock grazing the most common disturbance that leads to weed invasions and altered fuels and fire regimes at these lower elevations. Cheatgrass and halogeton invades dry sites, exacerbated by livestock grazing. These communities are increasingly threatened by the proliferation of non-native annual grasses. Historically, **they did not burn.**

BLM's Standards and Guides and other recent Assessments and documents across the Project area are replete with descriptions of cheatgrass and other weeds being a growing problem. However, BLM nearly always grossly under-estimates the extent of cheatgrass or other weed infestations in the understory, and fails to undertake cuts in livestock numbers even to the level of the actual numbers of livestock grazed. Grazing permits retain large numbers of ungrazable AUMs even under "Active" use. This results in constant pressure on BLM to "develop" more facilities, "treat" and disturb more land so overstocking can occur. End result: Weeds expand.

BLM often allows extra grazing on degraded lands (under the Temporary Non-Renewable Use) that may lead to further degradation, increased hazardous fuel problems, and introduction of even more aggressive exotic species.

Sagebrush semidesert is highlighted for conservation because of decline of sagebrush-obligate species. Species dependent include: sage sparrow, Brewer's sparrow, sage thrasher, sage grouse, pygmy rabbit, sagebrush vole, sagebrush lizard, pronghorn (Paige and Ritter 2000).

Fire regulates the density of fire-intolerant shrubs. Invasion of exotic annual grasses has increased fire frequency in stands, and resulting fires are causing a decline in abundance of sagebrush and other non-sprouting shrubs. In some areas, knapweed or other noxious weed species may be invading annual grass-dominated sites. Grazing decreases the importance of tall bunchgrasses and increases rabbitbrush, forbs and non-native grasses. Grazed sagebrush usually lacks altogether, or has no good condition microbiotic crusts. Large tracts of sagebrush semidesert and sagebrush-steppe are needed to adequately protect these systems.

Western juniper can live to be 1600 years old, and provides important wildlife habitat (ash-throated flycatcher, black-throated gray warbler, roosting cavities for bats, nesting cavities for raptors) and forest watershed function. Yet BLM across Oregon is currently laying waste to western juniper – resulting in hotter, drier sites more prone to weed invasion. How many acres have been treated? How much have weeds increased from pre-treatment levels? Which weeds have increased? What chemicals have been used? What chemicals will foreseeably be used? Where has cheatgrass invaded? Medusahead? How much more of this or other habitat/veg types will be disturbed during the life of the Oregon Weed EIS? We are dismayed at the rapid spread of medusahead on the Oregon-Idaho border in the vicinity of Jordan Valley. BLM actis in Oregon affect watersheds, sage-grouse populations, etc. shared with Idaho. Medsuahead is spreading like wildfire in areas where junipers have been burned off in the past, and where grazing and trampling disturbance occurs. BLM continues to allow cattle to trail right through known areas of medusahead infestation into lands not infested. There is no effort of any kind made by BKM ion the ground to control weed spread. End result: BLM kneejerk reaction of relying on massive amounts of herbicide rather than prevention, passive restoration, de-stocking, etc.

It is WWP's experience that BLM constantly ignores the importance of these old growth and mature western juniper habitats, and knowingly conducts projects to purposefully destroy them so as to increase livestock forage on depleted lands. Under ongoing BLM livestock management and paradigms that fail to use best available science, the aggressive proposed treatment actions of the 17 States EIS/PER, actins under the Oegon LUPs, will be carried out in just such a manner, and threaten still-intact habitats for these species.

Juniper habitats are threatened by grazing and fire, many are in degraded condition, and are still being chained to create rangeland for livestock. May use federal fire funds and in reality a relivestock forage projects.

Larger tracts of lower montane systems with connectivity to lower elevation sagebrush semidesert or basin and desert scrub systems are more likely to harbor larger populations of

bighorn sheep. The adjacent vegetation to juniper woodlands is sagebrush steppe at lower and upper elevation margins and sagebrush or bitterbrush is found in abundance in openings or understories. EIS/PER treatment projects using indiscriminate methods such as fire or herbicides to kill junipers – kill the shrubs, too.

The Partners in Flight North American Landbird Conservation Plan (Rich et al. 2004) identifies a critical need for strategic approaches to landbird conservation, and describes overarching threats faced by landbirds, including: significant direct loss of major bird habitats (including loss of western riparian, pinyon-juniper and sagebrush habitats); fragmentation and degradation of remaining habitats due to intensified agricultural practices, inappropriate grazing, spread of exotic vegetation and other factors; failure to identify and properly protect or manage habitat used during spring migration, fall migration, and winter. Birds stressed during migration require quality habitats for food and cover; a steady, widespread increase in dispersed mortality factors. These factors collectively contribute to a **high proportion of population declines and anticipated future threats.**

The Plan describes the growing recreational importance of birds, and the economic importance of bird-associated recreational activities. Birds also contribute to the maintenance of ecosystems – from dispersing native plant seeds to consuming insect pests. Conserving habitat for birds will contribute to meeting needs of other wildlife.

The Plan stressed it does not advocate conservation based on single species only, and encourages planners to identify common issues or habitats among suites of high priority species. It assesses conservation vulnerability based on biological criteria. PIF Assessment Factors include: Population size, breeding distribution, non-breeding distribution, threats to breeding, threats to non-breeding, and population trend.

The EIS/PER failed to examine such current population attributes in relation to areas slated for Treatment, and assess outcomes of treatments on many high priority species. Now the Oregon EIS seeks to impose large amounts of herbicide use without ever analyzing such effects.

Species of Continental Importance: Includes Watch List and Stewardship Species. Watch List: Greater Sage-Grouse, Swainson's Hawk, Short-eared Owl, White-throated Swift, Pinyon Jay, Brewer's Sparrow, Mountain Quail, Calliope Hummingbird, Black-capped Gnatcatcher, Virginia's Warbler. Stewardship Species: Gray Flycatcher, Western Scrub Jay ???, Sage Thrasher, Black-throated Gray Warbler, Green-tailed Towhee, Black-throated Sparrow, Sage Sparrow, Grasshopper Sparrow (?), Yellow-headed Blackbird, Rough-legged Hawk (winter?). Rosy Finch species (winter?).

Conservation of Stewardship Species will be a step towards maintaining broader suites of species within all biomes. LCP at 31 states: "**habitat loss remains the paramount factor for most species", and "habitats in danger of significant loss in the near future include western pinyon-juniper, sagebrush, and wetlands**. It describes the impacts of habitat fragmentation, and the growth in dispersed recreation such as OHV use.

Sadly, the series of Alternatives (Proposed and Preferred Actions) cast aside reasonable analysis of the impacts of the massive intervention and treatment disturbance put forth in the 1y States EIS/PER as well as chronic livestock degradation and desertification on these species, and the viability of habitats that will be drastically fragmented under the EIS actions.

Sage grouse are threatened by "extensive degradation of its sagebrush habitat by overgrazing and invasive plants" (LCP at 31). Livestock grazing "has had enormous effects on native vegetation – a century of selective removal of palatable plant species, soil compaction, water developments and livestock management activities" (LCP 2004, citing Saab et al. 2004. Habitat loss and fragmentation are also occurring on migration routes and in wintering areas.

Issues identified that transcend biomes, including:

- Habitat loss, degradation and fragmentation
- Forestry management
- Fire management strategies
- Wetland Issues
- Exotic or invasive species
- Resource extraction/energy
- Livestock grazing management
- Climate change
- Contaminants and pesticides
- Lack of information.

Lands slated for many of the treatments lie within the Intermountain West Avifaunal Biome, which is composed of 3 Bird Conservation Regions (BCRs). "Extensive mountain ranges and broad basins produce large elevational gradients that create a **complex and variable** environment - including coniferous forest, pinyon-juniper woodland, and cold semidesert shrubsteppe, and important wetland complexes. The IM West is center of distribution for many birds, and over half the Biome's SCSI have 75 percent or more of their population here. " **Threats and/or declining trends face Species of Continental Importance that use coniferous forest, pinyon-juniper woodland, shrubsteppe, and riparian habitats".**
For example:

* Coniferous forest: flammulated owl, Cassin's finch, others.
* Deciduous forest: Aspen forest is a declining habitat type SIC: Red-naped Sapsuckers, Mountain Bluebird.
* Woodland: Pinyon-juniper woodlands are especially characteristic of the southern portion of the IM West. **This habitat type supports the largest nesting-bird species list of any upland vegetation type in the West (Beidleman 2000),** cited in LCP at 53. SCI are Pinyon Jay, Gray Vireo and Gray Flycatcher. **Degradation** of woodlands has been widespread and continuous since European settlement.

Shrub-steppe species comprise the largest number of Species of Continental Importance in this biome. Conversion has occurred for ag., and it has suffered large-scale invasion of non-native grasses and forbs, range developments, sagebrush eradication and changes in fire frequency. This

has caused extensive loss and degradation of habitat, with subsequent population declines. **Cheatgrass has invaded over half of the existing sagebrush habitat.** It is the highest conservation priority in the Interior Columbia Basin (Saab and Rich 1997, Paige and Ritter 1999), and species include: Greater Sage-Grouse, Sage Sparrow, Sage Thrasher, Brewer's Sparrow, Green-tailed Towhee. "Montane shrublands embedded in the forests provide many species with valuable food and cover – and may be critical to hummingbirds during migration. Montane Shrubland SCI include: Dusky Flycatcher, Virginia's Warbler, Calliope Hummingbird, Green-tailed Towhee, Rufous Hummingbird, and Mountain Bluebird.

Riparian Habitats. Characteristics of riparian habitats vary widely depending on matrix and elevation, from cottonwood gallery forests to willow thickets. Nearly all riparian areas have been substantially degraded by development or alteration of many types – including de-watering, and alteration of flows, road construction, invasion of non-native species, logging, severe overgrazing, recreation.

Conservation issues include: Inappropriate livestock grazing, invasion of exotic plants change in fire intensity and frequency, logging practices affecting forest structure, and composition – especially mature, continued degradation of riparian habitat, **conversion of sagebrush and pinyon-juniper habitats, including through land management practices,** water diversion, alteration of flows, and spring development, recreational OHV use.

The 17 States EIS treatments and Oregon BLM ongoing treatments (chaining, fire, chopping, herbiciding, and "biological control" livestock grazing) are identical to past activities that have caused the ecological conversions to weedlands that are dooming native species. The EIS has failed to both provide a baseline of information on past acreages converted, the habitat fragmentation that has resulted, and the direct, indirect and cumulative impacts of its proposed greatly expanded treatments on resulting new conversion.

Recommended actions: Retain large tracts of forested vegetation. Maintain/promote growth of native grasses and forbs in shrub-steppe, prevent large scale wildfire, restore with native plants following disturbance. Maintain water quality and quantity and vegetation in embedded springs, seeps and riparian areas. Restore degraded habitats and habitats that have been converted to non-native grasslands. Protect high quality riparian habitat. Restore natural flows and flooding regimes.

Nowhere does the EIS and PER provide any protocol, analysis, mitigation, SOP or other provisions or analyses that would retain large tracts of any vegetation type, ensure seed-producing pine, or promote growth of native grasses and forbs. In fact, as the EIS fails to address livestock disturbance impacts and effects on outcomes of any treatments, and fails to provide science-based limitations on post-treatment livestock grazing and trampling use, there is no certainty that native grasses and forbs will not deteriorate further. This is especially the case as the very treatments identified may weaken or kill native grasses and forbs, as well as microbiotic soil crusts. The Oregon Herbicide EIS fails to adequately analyze the effects of this all, and effects on microbiotic crusts, of herbicide use.

Interfacing Communities/Natural Diversity and Inherent Complexity of Plant Communities. The habitat requirements of the ferruginous hawk illustrates the importance of understanding interfacing habitats. Ferruginous hawks typically nest in junipers at the edge of, or interfacing with sagebrush habitats. It is critical that BLM examine the already complex interspersion of plant communities across the landscape. Sagebrush communities often exist as complex mosaics with inherent natural diversity (Montana Department of Fish, Wildlife and Parks 1995, Welch and Criddle 2003).

BLM fails to address the inherent complexity and complex interspersion of vegetation across the landscape, and instead claims that its artificially imposed chaining and other disturbance is necessary to create more of a mosaic, or for greater diversity.

The ecological integrity of native plant communities is the foundation of healthy habitats for special status species, raptor prey species, and healthy watersheds and watershed processes that replenish aquifers for scarce desert springs.

Info and Analysis Needed on Species

BLM must conduct on-the-ground inventories of species, and habitat conditions and populations across the EIS area. BLM must use its current special status species list, Partner in Flight species lists, information from the Conservation Data Center, and other important recent summaries, such as Connelly et al. 2004 and Dobkin and Sauder 2004, and Wisdom et al. 2000, to examine species of concern and their habitat needs. It must conduct in depth surveys and analyses for species of concern, and collect thorough and up-to-date information on the quality and quantity of habitats across the EIS area.

BLM must carefully review these lists, and updated information, and assess habitat conditions for these species. BLM must conduct systematic baseline surveys for breeding birds, migrants, wintering species. BLM should work with experts to assess populations, genetic uniqueness, etc.). BLM must also fully consider the changing dynamics in wildlife populations – such as elk, and the high priority segments of the public place on this species, as well as antelope and mule deer.

Juniper birds are of high conservation concern (USFWS 2002, Rich et al. 2004). Yet, juniper habitats are among the **most consistently under-represented** habitat types in biological and ecological survey efforts (Red Willow Research 2004).

In the Great Basin Bird Conservation Region, high-priority Pinyon-Juniper species include: Pinyon Jay, Ferruginous Hawk, Plumbeous Vireo, Virginia's Warbler, and Black-throated Gray warbler. Pinyon-juniper and juniper woodlands/pygmy forest provide important breeding habitat for many wildlife species. Pinyon-juniper provides provides important food for birds and other wildlife. Avian species known to consume pinyon seeds include: Pinyon Jay, Steller's Jay, Black-capped Chickadee, Northern Flicker, Gray-eyed Junco, Black-billed Magpie, Clark's Nutcracker, Red-breasted Nuthatch, Pine Siskin, Juniper Titmouse, and Lewis Woodpecker (Martin and others 1951, cited in Red Willow 2004). Both pinyon nuts and juniper berries

provide a vital food resource for birds. Juniper berries remain on trees in winter, and are important for Cedar Waxwing, Townsend's Solitaire, Pinyon Jay, Clark's Nutcracker, Western Scrub Jay, Grosbeak sp., American Robin (Martin and others 1951; Johnson 1998; PIF 2000). Townsend's Solitaires establish winter territories based on juniper berry presence and abundance.

Extensive alteration has occurred to juniper (and pinyon-juniper in other areas of the Great Basin) in many ways – **chaining, spraying, and prescribed fire have been used to remove pinyon-juniper and juniper to plant livestock forage, especially at lower elevations on upper portions of alluvial fans and toeslopes of ranges.** Often, exotic crested wheatgrass was planted. Wildfires have consumed large acreages, including across southern Idaho, northern Nevada and northern Utah, as well as significant areas in Oregon. Plus, large-scale die-offs of sagebrush have occurred. BLM must assess the integrity and continuity of communities, identify higher quality communities, and protect them from new disturbance under a broadened range of Alternatives, and act to address and ameliorate ongoing, chronic disturbance of livestock grazing or other land use practices as part of the treatments assessed in a Supplemental the EIS. These areas will also provide reference areas for unfragmented habitats.

Wisdom et al. (2000) provide additional information on understanding animal species habitat needs. See Summaries for Species Groups 30-35 – two specific examples are provided below. Please apply information in this document to species and habitat needs analyses in the EIS area.

Examples:

Group 30. Ash-throated flycatcher and bushtit depend on a mix of source habitats. Retain contiguous blocks of mature juniper/sagebrush, especially old juniper with nest cavities. Consider site-specific ecological potential and response to management before removing juniper trees. Retain old growth, cavities, restrict pesticides, restore native understories, minimize likelihood of exotic invasion.

Group 31 . Ferruginous hawk, burrowing owl, vesper sparrow, lark sparrow, western meadowlark, shirt-eared owl and pronghorn. Ferruginous hawk populations fluctuate in response to prey populations. Breeding populations of short-eared owls are nomadic, and may occur when rodent densities are high. Burrowing owls rely on burrows provided by burrowing mammals (ground squirrels, marmots, coyotes, badgers) and may be closely tied to these mammals. Broad-sale changes in source habitats – have dramatic "decreasing" and "strongly decreasing trends". Source habitat remains in northern Great Basin and Owyhee Uplands. Source habitat loss – tied to loss of big sagebrush. Ag. conversion, conversion to exotics. BO populations have declined as the result of pest control programs. Meadowlark and lark sparrow success, correlated with grass. Removal of grass cover may have detrimental effects, presence of livestock may attract brown-headed cowbirds and increase brood parasitism.

Juniper expansion may have benefited ferruginous hawks. Microbiotic crusts have been widely destroyed by livestock. Roads, human activities and domestic dogs. Recreational shooting of marmots or ground squirrels impacts burrowing owls, and pesticide use may lead to direct

mortality.

Management implications. Most of habitat clusters 5 (Owyhee Uplands ERU) and 6 (northern Great Basin, Owyhee Uplands, Upper Snake ERU), with the potential risks to ecological integrity are: continued declines in herbland and shrubland habitats.
Primary issues: Permanent and continued loss of shrubsteppe due to ag conversion, **brush control**, cheatgrass invasion; Soil compaction and loss of microbiotic crust; Adverse human disturbance.

Note: "Brush control" is exactly what hazardous fuels projects are aimed to do. This is a clear threat to many species that rely on mature native plant communities.

Strategy: **Identify and conserve large remaining areas (contiguous habitat) of shrubsteppe vegetation where ecological integrity is still relatively high, and to provide long-term habitat stability for populations and provide anchor points for restoration, corridors, and other landscape-level management. Restore grass and forb components. Restore microbiotic crusts, maintain burrows. Minimize adverse effects of human intrusion.**

In support of conserving shrub-steppe, identify large areas of high ecological integrity to be managed for sustainability, on large areas of federal land. Criteria for protect and enhance include: maintaining or increasing the size of smaller patches, preventing further habitat disassociation, protecting or increasing the size and integrity of corridors, all in connection with the location of core areas. Use fire suppression and prevention to retard the spread of cheatgrass. Restore cheatgrass monocultures. Restore native vegetation. Design livestock grazing to promote abundance of forbs and grasses in understory, encourage development of microbiotic crusts. Allow burrows to persist or expand (Wisdom et al. 2000).

BLM "Range"/Vegetation Data

BLM typically has very little current information on ecological conditions and the health of native plant communities across the landscape. The last comprehensive ecological inventories (SVIM) were conducted primarily in the late 70s and early 1980s. When BLM conducts its limited and narrow Fundamentals of Rangeland Health assessments and allotment evaluations, it typically relies on old data, and never re-visits the sites where ESI data had been collected. Key Area sites are located in only the most accessible areas, and are clustered in particular areas of the allotments, leaving vast land areas with no monitoring information at all collected. BLM also fails to collect necessary data on degradation caused by livestock facilities and management activities. Such information is critical to understanding sources of flammable cheatgrass or other weed invasion, causes of roading, the inter-relationship and cumulative impacts of grazing facilities and roading. Current, comprehensive data on condition of soils vegetation, and habitats must be systematically collected. Likewise, BLM relies heavily on wildlife species data in databases and not current inventories. We fear that unless compilation and assessment of this information is conducted at the level of the EIS/PER, data and analysis necessary to understand all direct, indirect and cumulative impacts of the proposed actions will never be done.

BLM can not ignore evidence that its limited old data does show - i. e, only a small fraction of larger size native grasses present are present in most sites that should be dominated by these species. Thus, desertification has occurred, and "production" is greatly less than that of good or better condition sites, and this is typical of nearly all sites. These sites are very vulnerable to weed expansion with continued disturbance and unless long-term 'rest" allows recovery. BLM must also tie water developments, water hauling or other livestock management practices to site depletion and alteration of species structure, composition and weeds, hazardous fuels and fire problems.

As part of this process, BLM must revisit its limited monitoring sites (or at least a subset), and must also establish a series of new ESI and monitoring sites that represent the ecological condition of the lands where Oregon would apply massive amounts of herbicides to try to stave off weeds caused by the BLM's inability to limit or control livestock, and other disturbances.

BLM must also conduct comprehensive assessments, in representative sites grazed by livestock, and assess the role of livestock degradation in causing hazardous fuels or weed problems.

BLM Treatments Pose Grave Dangers to Native Species and Important Landscapes

BLM's17 States EIS/PER involves large-scale vegetation manipulation proposals – ranging from massive burning and "treatment" of conifers and aspen communities to extensive fragmentation (like burning "mosaics") across areas identified as some of the most intact remaining big sagebrush habitats in Interior Columbia Basin.

All of manipulation proposals pose serious risks to native species – and pose great threats of escalated weed invasion and permanent loss of plants, animals and biodiversity.

BLM must conduct a comprehensive analysis of pre-existing projects and disturbance across the landscape, and include analyses of treatments and disturbance factors across land ownership boundaries. BLM must also assess significant ecological problems that may have arisen in the wake of past manipulation, hazardous fuels or other treatments.

In our past experience with BLM, the agency has much exaggerated the needed scale of fire prevention treatment projects that may be necessary to protect plant communities or human habitations from large-scale fires. For example, in the Ely-Mount Wilson Urban interface near Ely, NV – only around 13% of the land area proposed by the Ely District was actually found necessary to be treated when BLM's own national-level fire experts, having assessed the situation, and developed a sane and reasonable approach.

As the acreage estimates for treatments proposed under the EIS are based on BLM District/Field Office estimates – with NO APPARENT SCIENTIFIC METHODOLOGY APPLIED for developing these estimates, BLM's over-exaggerations about treatment needs in the past must be used as the lens through which the public views claims of treatment need in the EIS/PER, and must provide the basis for trying to understand the amount and kinds of herbicide to be applied as weeds proliferate.

Grazing Carrying Capacity, Suitability and Capability Analysis

BLM must conduct a current livestock grazing capability and suitability analysis. BLM is aware that it has based livestock use areas and stocking rates on old adjudication processes – where AUMs claimed and then assigned in the adjudication process were often greatly inflated by ranchers. These "adjudicated" AUMs were not based on the ability of the land to sustain such high numbers of livestock and levels of use. To this day, BLM renews grazing permits at levels greatly in excess of thise able to be grazed. This creates constant tension for agencies to kill native shrubs and trees to try to grow "forage".

In the EIS capability and suitability analysis which is necessary to understand the risk of wed expansion and how much land will likely be sprayed, BLM must examine:
Slope, distance to natural water, dispersion of "forage" across the landscape – i.e. many lands have been so depleted that it takes dozens of acres to support an AUM – so the costs (including in weight gain/loss of livestock) are often so great that grazing is a resoundingly losing proposition, areas inaccessible due to winter snow, summer desiccation, etc.

Directly relevant to the Weed EIS is an assessment of the Risk that continued livestock grazing may push habitats over ecological thresholds from which they can not recover. Examples: Continued heavy stocking and degradation of mountain big sagebrush opening the door to cheatgrass invasion of understory; continued heavy stocking and degradation of juniper leading to cheatgrass invasion of understory; continued heavy stocking and degradation of sagebrush leading to both juniper and cheatgrass invasion of sagebrush.

BLM must also determine, for example, if lands where taxpayers may spend hundreds of dollars an acre to restore native vegetation that has been destroyed by livestock are suitable for continued grazing following herbicide or other treatment.

Sagebrush and Other Habitat Assessments

Assessments of the quality of sagebrush, salt desert shrub, juniper, montane conifer, aspen and other important habitats across the project area are necessary because: habitats and populations of species continue to decline across vast areas; there are many sagebrush species of concern; threats to sagebrush are regional in scale; regional knowledge facilitates development of consistent, efficient and credible management strategies for a comprehensive set of species. Federal land managers have legal responsibilities for effective management of habitats for sagebrush-associated species of conservation concern.

Analysis procedures include: Ecoregion and spatial extent, identify species of conservation concern, delineate ranges, estimate habitat requirements, identify regional Threats and Effects, estimate and map the Risks posed by each threat, Calculate Species-Habitat effects from all risks and other steps. Other Analyses include: Fragmentation, connectivity and patch size analyses, Consideration of non-vegetative factors affecting species of concern, change detection studies. Regional knowledge provides essential context for land use planning.

We have reviewed, for example, local sage grouse plans, and they fail to provide information/conduct several necessary analyses at the appropriate scale, and fails to present necessary information to the public, and do not integrate necessary information to understand scale and extent of Threats (such as livestock grazing, cheatgrass presence in understory or domination, livestock facility fragmentation, etc.) and other habitat degradation or fragmentation effects – especially for mammals, reptiles and many migratory birds. They also completely fail to describe or map attributes necessary to understand the **quality of habitats** that do exist. For example, there is no mapping or other information that shows sagebrush habitats dominated by cheatgrass; no mapping or other information to show where large understory grasses have been largely eliminated and weakened, and replaced by small *Poas* , or squirreltail, etc.

As part of an Integrated Weed Strategy, BLM must develop passive restoration actions along with any herbicide use. The Oregon EIS falls fall short here.

Threats to Sagebrush and Other Shrub-Dependent Species and Habitats Must be Assessed

BLM must assess the following existing threats to native vegetation and special status species, T&E species, and other important biota across the project area:

Wells and windmills
Pipelines
Troughs
Pipelines
Roads (often linked to facilities)
Salting Sites
Weed Infestations
Powerlines
Fences
Aquifer depletion

Cheatgrass-dominated understories
Cheatgrass, few shrubs

Altered understory species composition
Altered understory species structure
Altered overstory species composition
Altered overstory species structure (see, for example, Katzner and Parker 1997, and Federal Register 68 (43): 10389-10409) describing impacts of livestock-altered or thinned sagebrush to pygmy rabbit)

Vegetation Treatments (chainings, seedings, railings, herbicidings, mechanical such as mowing) lacking key habitat components and associated roading

Grazing season/disturbance conflicts with nesting, birthing, wintering or other critical period in

species life cycle
Grazing use levels fail to provide necessary habitat components (cover or food) based on nest available science
Livestock structural alteration of shrubs

Energy project siting (wind, geothermal, other) and associated roading and infrastructure such as utility corridors and lines
Mines and mining exploration and associated roading
Oil and Gas exploration and Development

OHV races
Areas of high OHV use
Unregulated motorized use
Road densities
Communication towers and other vertical structures

De-watering proposals (example – aquifer depletion and water export to Las Vegas), land disposal proposals.

Often overlooked threats from livestock facilities and structures include:

- Physical harm to species - obstacles such as fences that can cause injury or mortality;
- Structures cause species avoidance of areas, i.e. sage grouse avoid vertical structures.
- Providing elevated predator perches and nest predator perches (in the case of songbirds – brood parasite perches).
- Attract predators and act as sinks
- Attract brood parasites

All of these impacts may act directly, indirectly, cumulatively or synergistically with the effects livestock degradation associated with lands over broad areas surrounding these facilities may have to vegetation, soils and other habitat components. The end result is degradation and fragmentation of habitats for important and special status species.

This must be determined in a supplemental EIS **before** BLM can evaluate impacts of the large-scale disturbance that is being imposed under the Weed and Treatment EIS to many areas of still relatively intact native vegetation and species habitats.

The impacts of grazing on native wildlife, including species displaced by treatments into neighboring or sub-optimal habitats, must be assessed. For example, inundating sage grouse nesting or brood rearing habitats with large numbers of cattle or sheep during nesting season may cause: Removal of cover necessary to protect nesting birds and to hide and provide essential insect food for chicks; cause flushing of birds from nests – thus revealing nests to predators; cause separation of broods and increased vulnerability to predation; strip essential cover to hide hens and nests and conceal chicks from aerial vision-oriented predators and screen scent from ground-based predators. If this is coupled with loss of a significant portion of nesting habitat due

to a BLM sagebrush Tebuthiuron "treatment", impacts will be magnified, and populations suffer significant losses.

BLM must Conduct Population Viability, Persistence, Extinction/Extirpation Models for species of Native Wildlife, Rare Plants, Special Status Species and T&E Species Under all Alternatives.

The 17 States Action would treat 6 million acres a year, with a potential of 60 million acres in 10 years. This will have a widespread, and drastic, impact on special status species habitats and populations on Oregon and surrounding states.

Altered Fire Cycles

BLM must study the extent of cheatgrass in understories, and areas already dominated by cheatgrass. BLM must assess the risk of cheatgrass invasion of understories with continued or extended livestock use or disturbance. BLM cannot gloss over the role of ongoing livestock grazing in continuing disturbance that spreads and promotes cheatgrass, medusahead and other weed growth; in retarding recovery and continuing weakening of native vegetation in plant communities that still have a significant component of native species present, etc.

BLM must assess how the presence of cheatgrass may affect special status species. For example, how do cheatgrass-dominated understories and interspaces affect reptile species occurrence and abundance - (lizards may be prey species for small mammals)? How does cheatgrass affect the pygmy rabbit? Which of BLM's proposed treatment disturbances maximize chances of increased cheatgrass dominance of undestories?

In any discussion of plant communities where BLM claims the fuels/fuel loading is too heavy, BLM must examine causes heavy fuels related to livestock degradation, topsoil loss and change in site potential, climate change, etc.

Altered Composition and Structure/Lost Productivity

Over large areas of the EIS lands, larger sized native bunchgrasses and forbs have been eliminated, or significantly weakened. Only smaller stature native grasses and weeds remain. How do these smaller stature grasses affect fire behavior, outcomes of various treatments, etc.? Appropriate stocking levels for any areas grazed must be based on the amount of forage present on a sustainable level, and Risk of exotic species invasions must be minimized. In addition, with extensive depletion over large areas, BLM must assess the diminishing returns – and increased ecological damage done by livestock having to roam over dozens if not hundreds of acres to sustain themselves/harvest an AUM. This may lead to more trampling impacts, more disturbance, more sites for weeds to take hold, and more livestock-vectored movement of weed seeds across the landscape. BLM must identify areas where grazing is unsustainable, or where it will cause harm to still-intact communities, as part of the capability and suitability analyses. What lands are really capable, or suitable, to be grazed post-treatment?

Grazing systems, grazing intensity and season of use: Financial returns from livestock production, trend in ecological condition, forage production, watershed status and soil stability are all closely associated with grazing intensity (Holechek et al. 1998). Short-term rest or deferment can not overcome periodic heavy use. The conflicts with wildlife habitat needs, including food, cover, nutritional composition, space, lack of disturbance and other factors, must be studied.

BLM fails to address shifted, intensified or increased use by livestock that may occur as livestock are shifted into untreated lands. Nowhere does the EIS mandate removal of livestock grazed on treated lands, not merely displacement of livestock and their impacts to nearby areas. Increasingly, we are seeing BLM fail to reduce AUMs following fire, and Nevada BLM often takes no action whatsoever to limit livestock use of treatments. This all reduces the effectiveness of any treatments, and increases likelihood of increased weed proliferation in the wake of treatment or post-fire disturbance.

Range of Alternatives

As an additional comment on BLM's Range of Alternatives: Instead of structuring this process to develop a range of alternatives centered around the need to intensively alter and treat still relatively intact native vegetation and spray weeds everywhere, BLM must consider a range of alternatives that focus on restoring cheatgrass-infested lands, and protecting native vegetation as much as possible. Expansion of cheatgrass pushes communities across thresholds from which natural recovery is difficult - if even possible. Livestock grazing as only one of many competing uses on these fragile and much-abused arid lands which are already undergoing accelerated habitat fragmentation.

See also discussion in other WWP comments.

Drought Impacts, Drought Coupled with Treatments

All impacts of livestock grazing on all elements of the EIS must be assessed during drought, or other adverse weather conditions. How does drought affect productivity of vegetation? What are the additive, synergistic and cumulative impacts of grazing depletion and drought on loss of plant vigor, weakening, or death? Are prolonged droughts or more variable weather conditions foreseeable with global warming effects? How will this increase the risk of herbicide use and drift –including in cattle-desertified landscapes that themselves contribute to global warming?

How much are plants of good vs. poor vigor affected by drought? What utilization levels are appropriate on drought-stressed vegetation? What stocking rates are necessary to prevent depletion during drought? How does drought affect fuels and fire danger in plant communities weakened by the combined effects of grazing and drought? Do they become vulnerable to cheatgrass and other weeds that increase fire dangers and cause fuels problems?

What are the impacts of treatments, and likelihood of success under drought conditions? How

would the effects of a passive treatment (reduction in, or removal of livestock) compared to invasive disturbance treatments as proposed under the EIS?

Need To Understand Impacts Of Grazing and Other Uses On Sage Grouse And Other Special Status Species

Sage grouse depend on a variety of shrub-steppe habitats, and populations may move over large areas of land in the course of a year. Overhead cover of sagebrush and tall residual native grass cover are critical to successful sage grouse nesting (DeLong et al. 1995; Connelly et al. 2000; Hockett 2003; 69 Federal Register (77) 21489; Connelly et al. 2004). The sage grouse is reliant on sage-steppe communities, and its populations have plummeted westwide. Excessive livestock grazing strips required nesting cover that screens nests of ground- and shrub-nesting birds from ground and aerial predators, and alters long-term diversity of native forbs that produce insects essential to the diet of sage grouse chicks. Sage grouse eat only sagebrush in winter, and require intact stands for winter survival. Physical breakage of sagebrush and nipping by livestock also alter and decrease sagebrush cover essential for sage grouse and other sagebrush species.

The "Guidelines to Manage Sage Grouse Populations and their Habitats" (Connelly et al. 2000), have been adopted by the Western Association of Fish and Wildlife Agencies (WAFWA) guidelines, and present well-established information on essential habitat components and management based on sage grouse needs. The WAFWA guidelines are now buttressed by the recent WAFWA Conservation Assessment of Greater Sage-Grouse and Sagebrush Habitats (Connelly et al. 2004).

The WAFWA Guidelines and the recent WAFWA Conservation Assessment (Connelly et al. 2004) underscore the following points with respect to sage grouse biological and habitat needs:

- The great importance of herbaceous cover in nesting habitats (WAFWA at 968; CA at 4-4 to 4-8). Grass height and cover are important to nest success. Herbaceous cover provides scent, visual and physical barriers to predators. (WAFWA at 971; CA at 4-4 to 4-8);

- Successful sage grouse nesting occurs under larger bushes. Nesting habitat has greater canopy cover, taller live and residual grasses, more live and residual grass cover, and less bare ground (WAFWA at 970-971; CA at 4-4 to 4-8);

- Successful nests occur in stands with greater canopy cover (WAFWA at 971; CA at 4-4 to 4-8);

- Early brood rearing habitats should have greater than 15% canopy cover of grasses and forbs. After chicks hatch, these grasses and forbs produce insects for chicks to eat and canopy cover to screen them from predators. Later, forbs are eaten by maturing chicks. Forbs are also important in providing adequate pre-laying nutrients to hens (WAFWA at 971; CA at 4-8 to 4-9);

- As upland vegetation desiccates, hens with broods seek out late brood rearing habitats comprised of areas with succulent green forb vegetation, such as wet meadows and riparian areas (WAFWA at 971; CA at 4-9 to 4-11);

- Winter habitats have relatively dense sagebrush canopy cover, with sagebrush exposed above the snow (WAFWA at 972; CA at 4-14).

105. Habitat protection management actions for sage grouse are summarized in the WAFWA Guidelines, and include:

- Manage breeding habitats to support 15-25% canopy cover of sagebrush, 18 cm. or greater perennial herbaceous cover height (grasses and forbs) (WAFWA at 977);

- In late summer brood rearing habitats, "avoid land use practices that reduce soil moisture effectiveness, increase erosion, cause invasion of exotic plants, and reduce abundance and diversity of forbs" (WAFWA at 980);

- "Avoid developing springs for livestock water." If this must occur, "design project to maintain free water and wet meadows at the spring," as "capturing water from springs using pipelines and troughs may adversely affect wet meadows used by grouse for foraging" (WAFWA at 980).

In addition, US Fish and Wildlife Service (69 Federal Register (77) at 21491, and the 2008 USFWS Interim Status review for sage-grouse describes studies showing that losses of hens and nests are related to herbaceous cover surrounding nests. "Enhancing Sage Grouse Habitat, a Nevada Landowner's Guide" (Northwest Nevada Sage Grouse Working Group) also cites studies showing that sage grouse nests were least preyed upon when a residual cover of 7 inches or more of herbaceous vegetation was present.

Thus, there is strong scientific support for application of grazing use standards that provide for 7-9 inches of residual stubble height left uneaten on native grasses. Unfortunately, the livestock utilization levels now being applied across the nearly the entire EIS Project area **will not provide for necessary residual stubble heights and cover for sage grouse nesting**, even under normal circumstances – let alone under drought, or weakened or low vigor conditions, or shifted or increased livestock use onto untreated lands in the wake of widespread treatments.

As treatments are conducted under the EIS, wildlife including special status and T&E species will be faced with new habitat fragmentation on top of the management deficiencies on untreated BLM lands.

An EA from the BLM's Jarbidge Field Office (BLM Jarbidge EA, Ch. IV, pg. 88-89). The public lands of the BLM's Jarbidge Field Office are contiguous with the USRD area, and are sagebrush-steppe and other communities, with species of native bunchgrasses that are the same as the allotments here.

BLM has found that with 50% utilization levels, as allowed across the EIS lands, bluebunch wheatgrass is grazed to 4.5 inches, Idaho fescue is grazed to 2.0 inches, Thurber's needlegrass is grazed to 2.8 inches, bottlebrush squirreltail is grazed to 1.5 inches, and the exotic crested wheatgrass is grazed to 3.5 inches. All of these residual stubble heights are thus far less than the 7-9 inch stubble heights called for under the best scientific information available, such as the WAFWA guidelines discussed above; and demonstrate that grazing under BLM's current management will result in far more utilization and seriously inadequate cover for sage grouse. BLM's often woefully inadequate upland utilization levels and hand full of riparian stubble heights on permits across the project area are often not even required Terms and Conditions on grazing permits, so there is no assurance that compliance will occur.

In many areas across the EIS area, livestock grazing has caused depletion of larger-sized native bunchgrasses capable of providing grass heights sufficient to mask sage grouse nests and to protect nests and chicks from predation. These larger "decreaser" grass species have been replaced with smaller "increaser" grasses like small *Poas* (bluegrasses) or unpalatable weeds. The direct, indirect, synergistic and cumulative impacts of the many treatments under the EIS/PER must be assessed in relation to such livestock impacts to sage grouse and other species habitat components.

Harmful Impacts of Livestock Facilities: Habitat Degradation and Fragmentation

A growing body of scientific evidence demonstrates the negative impacts of fences and other vertical objects, as well as the increased fragmentation of sagebrush-steppe and other wild land habitats that result from placing vertical objects in sage grouse habitats. (Connelly et al. 2004).

BLM must conduct a full inventory and assessment of all existing livestock facilities and

developments on lands identified by its Field Offices for treatment under the EIS/PER, including, all water haul and salting sites, and all vegetation treatments that have been conducted on these lands. The full array of direct, indirect, cumulative and synergistic impacts of these projects and activities must be assessed.

A substantial body of scientific information demonstrates the harmful impacts of fences and other range developments on sage grouse. Sage grouse evolved in an open landscape without vertical structures, and they naturally avoid using areas near these structures - which include fences and fence posts. Sage grouse habitats are fragmented by fences and other facilities associated with grazing (USFWS 69 Federal Register (77) at 21490). Fences and other facilities (as associated with wells, pipelines, troughs and water developments in the three allotments) provide perching locations for raptors, and associated roading that grows up along fences or in association with other livestock facilities provides both travel corridors for predators and conduits for weeds (69 Federal Register (77): 21490). Mechanical treatments and seeding with exotics degrades sage grouse habitat by altering structure and composition of vegetative community (69 Federal Register (77): 21488). Development of springs and other water sources to support livestock in upland shrub-steppe habitats can artificially concentrate domestic and wild ungulates in sage grouse habitats, and worsen grazing impacts (69 Federal Register (77) at 21489). Direct mortality of sage grouse from collisions with fences is described in the WAFWA guidelines at 977, and USFWS in 69 Federal Register (77) at 21492.

Sage grouse are a landscape-scale species, inhabiting large, interconnected expanses of sagebrush. A mosaic of fragmentation now exists across many parts of the landscape, including portions of these allotments, and BLM's Proposed Actions in the EIS/PER would extend and worsen fragmentation effects across the landscape. Causes of habitat fragmentation include vegetation treatments and removal of sagebrush, wild and prescribed fire, livestock facilities and zones of livestock concentration. There is mounting evidence of long-term negative effects of fire on sage grouse populations (WAFWA Conservation Assessment at 4-16, 7-28), 80% of the land area in the Great Basin is susceptible to displacement by cheatgrass (WAFWA CA. at 7-17 and Fig. 7.10). Wyoming and basin big sagebrush shrub cover types occupy large areas in the EIS lands and are the cover types most susceptible to displacement by cheatgrass (these areas comprise large portions of the three allotments). The ecological effects of livestock grazing may alter vegetation communities, water and nutrient availability and soils so that **lands cross thresholds from which the system can not recover** (WAFWA CA. at 7-29 to 32). Habitat treatments have consequences for the habitat dynamics and wildlife use of habitats – and "each potentially decreases the suitability of sagebrush for wildlife" that depend on large, unfragmented sagebrush habitats" (WAFWA CA at 7-32). Evaluation of sagebrush communities primarily based on their ability to produce livestock forage (as in the case of these lands), may result in extensive alterations that are unsuitable for sage grouse and other species dependent on sagebrush habitats (WAFWA CA at 1-3).

Fences influence livestock and predator movement, facilitate spread of exotic plants, provide travel and additional access for human disturbances, increase mortality due to direct collisions,

and increase predation rates by providing perches for raptors (WAFWA CA at 7-34 to 35).

Fences used to control grazing (or in the aftermath of the treatments that may result under various EIS/PER actions) modify the landscape by creating an artificial mosaic (WAFWA CA at 7-35), and allow more intensive grazing and loss of necessary habitat components such as residual grass cover for nesting. Intensified or more uniform use inside fenced areas results in patterns of unusable habitat across the landscape. Water developments influence the composition and relative abundance of plants (WAFWA CA at 7-35). Thus, infrastructure to support grazing programs including fences and water developments have both direct and indirect effects on the landscape (WAFWA CA at 13-9). Grouse may not commonly use water developments, and "water developments tend to attract other animals, and may serve as a predator "sink" for sage grouse, i.e. grouse fall victim to the many predators attracted to water developments (WAFWA CA at 4-12).

The Conservation Assessment describes impacts of disturbance of sagebrush habitats by vegetation treatments (at 13-6); depletion of native vegetation facilitating cheatgrass invasion (at 13-7); problems associated with blocks of crested wheatgrass and exotic seedings (at 13-7 to 8); landscape-level concerns – including that areas with larger patches of sagebrush remaining receive lower precipitation and are the least resilient to disturbance (such lower precipitation areas characterize much of the arid land area targeted for treatment). This highlights why careful management of these lands is crucial) (at 13-8 to 9).

An unknown array of livestock facilities has already been constructed throughout the three allotments (on both BLM and private lands) to facilitate, extend and concentrate livestock grazing. These facilities include wells, windmills, spring developments and water diversions, pipelines, troughs, stock ponds – at times dug into and destroying springs, fences and corrals. Some have fallen into abject disrepair – windmills lie crumpled on the ground, junk tanks and troughs are strewn across the landscape. Fences have improper spacing. Not only do these facilities concentrate large numbers of livestock with deleterious impacts to soils, vegetation and wildlife habitats in their vicinity and radiating outward over broad areas, unplanned roading is often directly related to construction or maintenance of these facilities. Plus, there are innumerable livestock salting or mineral supplement sites, too, which also result in zones of intensive livestock disturbance and incidental roading. All of these areas of livestock concentration, where heavy and severe livestock use has compacted soils and destroyed cover and food for wildlife, exhibit harmful impacts to vegetation and native wildlife habitats. These developments and zones of intensive disturbance fragment habitats, and cover and food, for native species including sage grouse (Braun 1998; Freilich 2003; Connelly et al. 2004). Such projects have been constructed throughout habitats critical for sage grouse and other shrub-steppe species. New pipeline spurs incrementally constructed would extend and shift livestock use to

new and less grazed areas, as the vegetation has been depleted by livestock around existing artificial or natural water sources (Sada et al. 2001).

BLM lands that are not close to livestock water sources often comprise the best remaining healthy native vegetation communities and are thus very important habitats for native sagebrush-steppe species – precisely because they have been far less altered by livestock impacts. On top of the existing network of facilities BLM treatments may foreseeably result in plans to construct dozens of new projects (fences and water sources to keep cattle off of EIS/PER treated lands), thus greatly expanding the zones of disturbance and intense livestock concentration into currently better condition habitats.

Networks of roads associated with livestock facilities (and which will likely grow dramatically as vegetation is burned or otherwise treated and thus cleared under the EIS) serve as conduits for exotic plant invasions (Gelbard and Belnap 2003), and travel corridors for predators (Braun 1998, Connelly et al. 2004). The development of a maze of roads fragmenting the landscape has resulted from the proliferation of livestock facilities across the landscape, and BLM past treatments. Roads grow up as lands are treated, or projects are constructed and maintained. Treated lands, cleared of woody vegetation, are also greatly subject to increased Off-road use, and new roading development from this activity.

Instead of attempting to rest to enhance habitats or jump start recovery through passive restoration techniques, or place strict use livestock use limits on areas susceptible to weed invasion such as degraded riparian areas, BLM relies overwhelmingly on new treatment and other disturbances and likely more harmful facilities, such as the construction of a series of fences, with accompanying development and de-watering of wetland areas through piping water to troughs. Large new areas of better condition habitats then become wastelands/weedlands as a result of intensified use.

An increasing body of science demonstrates that fences are harmful to sage grouse and many other species of native wildlife, and that sage grouse may avoid use of areas near fences. BLM's post-treatment actions may in fact further fragment habitats beyond removal of vegetation, and rendering patches of remaining untreated or native vegetation unusable by grouse, while creating extended wasteland areas in their surroundings, causing expanded environmental harm.

Instead of taking strong and decisive action to restore and enhance habitats and populations, BLM pursues a path of new and extended habitat alteration and fragmentation across the allotments under the guise of hazardous fuels, and restoring a "natural" fire interval that can no longer be considered natural under the chronic disturbance caused by livestock and in the face of exotic species invasions. .

Degradation, fragmentation and loss of sagebrush across landscapes has imperiled the sagebrush-steppe avifauna. Besides the many effects described for sage grouse, these habitat changes and fragmentation have been shown to affect abundance of shrub-steppe birds Paige and Ritter 1999, Knick et al. 2003, Connelly et al. 2004 at 1-3.

The habitat for many native wildlife species across the EIS lands is already fragmented. Populations are shrinking, and increasingly isolated. Fragmentation would continue and escalate with new livestock developments, livestock management practices that result in zones of livestock concentration, and other disturbances under the actions as laid out in the EIS/PER. Disturbance and depletion associated with livestock grazing and associated rangeland developments serve to break up and fragment the continuous cover of native sagebrush-steppe vegetation necessary for many sagebrush-dependent wildlife species survival (Knick and Rotenberry 1995; Knick et al. 2003; Freilich et al. 2003; 69 Federal Register (77), Connelly et al. 2004).

The Snake River Birds of Prey Area: Case Study in How NOT to Manage Lands

BLM must closely examine the woeful management failures of BLM in the Snake River Birds of Prey National Conservation Area to understand the consequences of continuing near status quo forage allocations, livestock project construction/water hauling, roading, etc. and the inability of the land to recover following fire or other disturbance under BLM's post-fire management and ESR activities. A 1996 USDI BLM/IDANG report details the ongoing destruction of habitat caused by fire, grazing and other human activity (including military training). The loss of sagebrush in the SRBOPA is clear to even the most casual observer driving through the area. A proliferation of exotic species – cheatgrass, medusahead, bur buttercup, and now white top, rush skeletonweed, and other noxious weeds - have occurred in the wake of the excessive livestock seasons of use and numbers that have been authorized here in the past and under new 10-year grazing permits issued by BLM that continue these same stocking rates and use levels. The grazing levels and management paradigms in the SRBOPA (high allowable utilization of 50%, and many harmful grazing practices) are similar to BLM grazing management across the EIS area), and also include continued construction of new livestock projects or providing water in arid uplands through facilities and water hauling.

Over the years since the SRBOPA NCA has been designated, we have watched as BLM has continued to allow grazing during periods of the year that are known to be harmful to native bunchgrasses and forbs, to allow use at high levels, including during drought years, and generally continue management in a manner biased towards the livestock industry. Hazardous fine fuels have only increased. The situation has only worsened with each new fire, and the failure of BLM to take necessary measures - especially passive measures such as removal of livestock coupled

with native seedings, to restore these NCA lands.

The SRBOPA situation should be used by BLM as an example of how fire and subsequent grazing management failures and out-dated management paradigms affect sagebrush lands. Spraying large amounts of herbicide on such lands, while continuing disturbances, is futile.

The lower elevation Oregon Owyhee watershed, including even portions of the Louse Canyon GMA bear many similarities to the SRBOPA.

The calamitous weedland situation of the SRBOPA also illustrates the failure of the EIS/PER to reveal to the public how the proposed actions will be carried in landscapes of national significance, and how these important areas may be protected from unnecessary and undue degradation under EIS/PER actions. For example, BLM has been touting the use of livestock to graze firebreaks in cheatgrass. Is this action, under the EIS/PER's flawed definition of "biological control" likely to be used widely in the SRBOPA or Oregon, instead of undertaking necessary restoration action accompanied by large-scale livestock reductions or cessation of grazing?

We have just received Proposed Decsions from Oregon BLM for Louse Canyon – after 5 years of litigation and NO current data or analysis of stocking rates, BLM proposes a reduction of apply around 50 AUMs! Virtually no difference at all despite weeds exploding, microbiotic crusts greatly damaged, sage-grouse and other habitats increasingly fragmented by livestock facilities, hardened roading, etc. and many other signs of ecological degradation and the road to ruin.

We ask that this Oregon Weed EIS effort incorporate the Louse canyon record from the oroginal FRH assessments to the recent Proposed Decisions as an illustration of the FAILURE of BLM to practice integrated Weed Management.

Grim Ecological Realities of Current BLM Management

Species such as the loggerhead shrike or pygmy rabbit that require structurally diverse sagebrush cover and mature or old growth sagebrush communities are greatly at risk of undergoing extensive and accelerated habitat loss under BLM's treatment scenario. BLM fuels treatments target old growth and mature sagebrush that are essential to many sagebrush-dependent species. Examples: January 2006 Winnemucca BLM proposal to herbicide, burn, mow and otherwise disturb 40,000 acres of sagebrush in the Little Owyhee allotment over the next 10 years. See Nevada BLM *Sage Notes* 2004, killing old growth Wyoming big sagebrush in occupied pygmy rabbit habitat to plant crested wheatgrass as livestock forage and claiming it is a fuelbreak in the Spruce and Valley allotments. See also Elko BLM 2005 Spruce Veg Treatment EA, proposing burning, chaining in Spruce Mountain. North Fork Malheur GMA Oregon BLM proposed Veg killing projects, Burns North Steens Project etc.

USDI BLM. 2005, Elko District's Draft Sheep Complex, Big Springs and Owyhee Grazing allotments Sensitive Bird Species DEIS illustrates the failure of BLM at the Activity Plan level, to address habitat needs of important and special status species. Here, **despite a Federal Court**

order to consider the habitat needs of sensitive bird species in livestock grazing decisionmaking, BLM proposes harmful new facilities and crested wheatgrass seedings and sagebrush mowing in the midst of mature and old growth sage grouse, burrowing owl, pygmy rabbit and other important and special status species habitats. The veg. treatments, livestock facilities, lax grazing requirements and stocking with cattle and sheep 28-50% above the levels that have been grazed here in the past. Sadly, this is the reality of the current situation on arid BLM lands across the West, and is the real environmental setting/management paradigm landscape, that BLM must consider in assessment of the environmental risks and harms of actions proposed in the EIS/PER. Plus, researchers tied to ag interests and land grant colleges are acquiring large federal fire fund and other grants to manipulate and treat sagebrush, pinyon-juniper and other vegetation, and BLM is authorizing large acreages of new "research" killing of sagebrush and pj under categorical Exclusions. See Ely District BLM Butte Valley proposal. These impacts are completely unassessed in the EIS/PER.

Please see the Petition to List the Pygmy Rabbit and associated bibliography to illuminate the critical importance of mature, old growth and structurally complex native vegetation to declining important and special status species across the arid West, and to illustrate the high level of loss and fragmentation of sagebrush and other habitats across the West. BLM's EIS/PER aggressive treatment disturbance to mature and old growth plant communities will only serve to accelerate habitat fragmentation and degradation.

The primary plant communities being dubbed hazardous fuels and targeted for 'treatment" across BLM and Forest Service lands across the West are primarily old growth and mature native vegetation communities upon which many rare and declining species rely. Case on pint: Lakeview BLM sagebrush mowing areas in pygmy rabbit and sage-grouse habitats. Sagebrush mowing promotes rapid spread of cheatgrass. Thus, the treatment and herbicide actions that disturb these vegetation communities instead of having BLM's claimed rosy outcomes, will further endanger sagebrush and juniper dependent species, and have deleterious watershed-level impacts affecting such species as Lahontan cutthroat trout or bull trout. Without providing necessary data on not just broad vegetation types where it contemplates treatment, but also how it characterizes "hazardous fuels" and vegetation to be targeted, no honest Weed EIS analysis or adequate BA for spraying and treatments can be provided.

This demonstrates why BLM must abandon its myopic analysis and limited alternatives that would radically alter large areas of the arid West that still contain largely native vegetation, and instead develop a range of new alternatives focused on passive restoration of remaining better condition communities. This is essential to maintain, enhance or restore public lands, native vegetation and special status species and T&E habitats. If BLM proceeds on the aggressive disturbance and herbicide campaign laid out in the EIS/PER, native species and T&E species will only suffer further declines.

Sincerely,

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Please apply the following literature, and the Restore Native Ecosystems Bibliography, to these and other WWP comment submissions.

Relevant Literature

Anderson, L. D. 1991. Bluebunch wheatgrass defoliation: effects and recovery. USDI Bureau of Land Management Technical Bulletin 91-2. Salmon, ID.

Anderson, D. C., K. T. Harper and R. C. Holmgren. 1982. Factors influencing development of cryptogamic soil crusts in Utah deserts. Journal of Range Management 35(2):180-185.

Anderson, J. E. and K. E. Holte. 1981. Vegetation Development over 25 years without grazing on sagebrush-dominated rangeland in southern Idaho. Journal of Range Management 34(1):25-29.

Anderson, Jay E. and Richard S. Inouye. 2001. Landscape-scale changes in plant species abundance and biodiversity of a sagebrush steppe over 45 years. Ecological Monographs 71(4):531-556.

Belnap, J. 1995. Surface disturbances: their role in accelerating desertification. Environmental Monitoring and Assessment 37:39-57.

Belnap, J. and D. A. Gillette. 1997. Disturbance of biological soil crusts: impacts on potential wind erodibility of sandy desert soils in southeastern Utah. Land Degradation and Development 8:355-362.

Belnap, J., R. Rosentreter, S. Leonard, J. H. Kaltenecker, J. Williams and D. Eldridge. 2001. Biological soil crusts: ecology and management. USDI BLM. Technical Reference 1730-12.

Belsky, A.J. 1996. Review of the scientific assessment of western juniper woodlands (of the Pacific Northwest). Eastside Ecosystem Management Program EIS.

Belsky, A.J. 1996. Viewpoint on western juniper expansion: is it a threat to arid western ecosystems? J. Range Management. 49. 53-59. www.onda.org/library/papers/index.html. <http://www.onda.org/>

Belsky, A. J. and D. M. Blumenthal. 1997. Effects of livestock grazing on stand dynamics and soils of upland forests of the Interior West. Conservation Biology 11: 315-327. www.onda.org/library/papers/index.html <http://www.onda.org>

Belsky, A. J., A. Matzke, and S. Uselman. 1999. Survey of livestock influences on stream and riparian ecosystems in the western United States. Journal of Soil and Water Conservation 54:419-431.

Belsky, A. J. and J. Gelbard. 2000. Livestock grazing and weed invasions in the arid west. Oregon Natural Desert Association. Bend, OR. [available on-line at www.onda.org/library/papers/index.html <http://www.onda.org/library/papers/index.html>]

Beymer, R. J. and J. M. Klopatek. 1992. Effects of grazing on cryptogamic crusts in pinyon-juniper woodlands in Grand Canyon National Park. Am. Midland Naturalist. 127:139-148.

Billings, W. D. 1994. Ecological impacts of cheatgrass and resultant fire on ecosystems in the Western Great Basin, in S.B. Monsen and S.G. Kitchen, eds. Proceedings - ecology and management of annual rangelands. USDA Forest Service. General Technical Report INT-GTR-313. Intermountain Research Station. Ogden, UT.

Braun, C. 1998. Sage grouse declines in western North America: what are the problems? Proc. Western Assoc. State Fish and Wildlife Agencies 78.

Chaney, E., W. Elmore, and W. S. Platts. 1990. Livestock grazing on western riparian areas. Report prepared for the U.S. Environmental Protection Agency by Northwest Resources Information Center, Inc. Eagle, ID.

Chaney, E., Elmore, W. and W. S. Platts. 1993. Managing change: livestock grazing on western riparian areas. Northwest Resource Information Center. Eagle, ID.

Clary, W. P. and B. F. Webster. 1989. Managing grazing of riparian areas in the Intermountain region. General Technical Report INT-263. USDA Intermountain Research Station.

Collopy, M.W. and J. Smith. 1995. National status and trends; the Pacific Northwest (Draft). UDI/NBS Forest and Rangeland Ecosystem Science Center, Corvallis, OR.

Connelly, J. W., M. A. Schroeder, A. R. Sands, and C. E. Braun. 2001. Guidelines to manage sage grouse populations and their habitats. Western Association of Fish and Wildlife Agencies. Wildlife Society Bulletin 2000, 28(4):967-985.

Connelly, J. W., S. T. Knick, M. A. Schroeder and S. J. Stiver. 2004. Conservation assessment of

greater sage grouse and sagebrush habitats. Western Association of Fish and Wildlife Agencies. Cheyenne, Wyoming. [available on-line at www.ndow.org/wild/sg/resources/assessment.shtm < http://www.ndow.org/wild/sg/resources/assessment.shtm>]

Conservation Biology Institute. 2000. Importance of BLM roadless areas in the western US. Full report can be viewed at *www.consbio.org* < *http:// www.consbio.org/*> .

Coulter, I. Davidison, L. Dickson. N. Edelson, R. Eliot, R. M. Erwin, S. Hatch, S. Kress, R. Milko, S. Miller, K. Mills, R. Paul, R. Philips, J. E. Saliva, B. Syderman, J. Trapp, J. Wheeler, and K. Wohl. 2002. Waterbird Conservation for the Americas: the North American Waterbird Conservation Plan, Version 1. Waterbird Conservation for the Americas. Washington, DC.

Donahue, D. 1999. The western range revisited: Removing livestock from public lands to conserve native biodiversity. University of Oklahoma Press, Norman, OK.

DeLong, A. K., J. A. Crawford, and D. C. DeLong. 1995. Relationship between vegetation structure and predation of artificial sage grouse nests. J. Wildlife Management. 59(1):88-92.

Dobkin, D. S. and J. D. Sauder. 2004. Shrubsteppe landscapes in jeopardy. Distributions, abundances and the uncertain future of birds and mammals in the Intermountain West. High Desert Ecological Research Institute. Bend, OR.

Duff, D. A. 1977. Livestock grazing impacts on aquatic habitat in Big Creek, Utah. *In* Proceedings of the workshop on livestock and wildlife –fisheries relationships in the Great Basin.

Dyksterhuis, E. J. 1949. Condition and management of range land based on quantitative ecology. Journal of Range Management 2:104-115.

Eddleman, L. L., P. M. Miller, R. F. Miller, and P. L. Dysart. 1994. Scientific assessment of western juniper woodlands (of the Pacific northwest). Eastside Ecosystem Management Program. EIS.

Everett, R.L. 1987. Plant response to fire in the pinyon-juniper zone. p.152-157 in R. L. Everett, ed. Proceedings – pinyon-juniper conference. USDA Forest Serv. Tech. Rep. INT-215.

Everett, R.L. 1987. (ed.) Proceedings – pinyon-juniper conference. USDA Forest Serv. Gen. Tech. Rep. INT-215.

Everett, R. L. and W. Clary. 1985. Fire effects and revegetation of pinyon-juniper woodlands p. 33-37 in Rangeland Fire Effects: a symposium. USDI. BLM. Boise.

Federal Register. November 30, 2001. Endangered and threatened wildlife and plant; emergency rule to list the Columbia Basin distinct population segment of the pygmy rabbit (*Brachylagus idahoensis)* as endangered. 66, 231: 59734-59749.

Federal Register. November 30, 2001. Endangered and threatened wildlife and plants; Proposed rule to list the Columbia Basin distinct population segment of the pygmy rabbit (*Brachylagus idahoensis)* as endangered. Vol. 66, 231: 59769-59771.

Federal Register. July 15, 2002. Endangered and threatened wildlife and plants; Listing the plant *Lepidium papilliferum* (slickspot peppergrass) as endangered. Vol. 67, 135: 46441-46450.

Federal Register. July 17, 2002. Endangered and threatened wildlife and plants; reopening of the comment period on the proposed listing of the Columbia Basin Distinct Population Segment of the pygmy rabbit (*Brachylagus idahoensis*) as endangered . Vol. 67, 137: 46951.

Federal Register. March 5, 2003. Endangered and threatened wildlife and plants: Final Rule to List the Columbia Basin Distinct Population Segment of the Pygmy Rabbit (*Brachylagus idahoensis*) as Endangered. Vol. 68, 43: 10388-10409.

Federal Register. March 5, 2003. Endangered and threatened wildlife and plants; Final Rule to list the Columbia Basin Distinct Population Segment of the pygmy rabbit (*Brachylagus* i *dahoensis*) as endangered. Vol. 68, 43:10389-10409.

Federal Register. April 21, 2004. Endangered and threatened wildlife and plants; 90-day finding for petitions to list the greater sage grouse as threatened or endangered. Vol. 69(77):21484-21494

Fleischner, T. 1994. Ecological costs of livestock grazing in western North America. Conservation Biology 8:629-644.

Freilich, J. E., J. M. Emlen, J. J. Duda, D. C. Freeman and P. J. Cafaro. 2003. Ecological effects of ranching: a six-point critique. BioScience 53(8):759-765.

Galt, D., G. Mendez, J. Holechek and J. Joseph. 1999. Heavy winter grazing reduces forage production: an observation. Rangelands 21(4):18-21

Galt, D., F. Molinar, J. Navarro, J. Joseph and J. Holechek. 2000. Grazing capacity and stocking rate. Rangelands 22(6):7-11

Gelbard, J. L. and J. Belnap. 2003. Roads as conduits or exotic plant invasions in a semiarid landscape. Conservation Biology 17 (2):420-432.

Gerber, M.F.. J.C. Munger, A. Ames and J. Stewart. 1887. Reptiles and amphibians in deep canyons: the Big Jacks and Little Jacks Creek drainages of Owyhee County, Idaho. BLM Technical Bulletin 97-1.

Gilbert, B. N. 2003. Motorized Access on Montana's' Rocky Mountain Front: A synthesis of scientific literature and recommendations for use in revisions of the travel plan for the Rocky Mountain division. Coalition for the Rocky Mountain Front.

Gifford, G. F. 1973. Runoff and sediment yields from plots on chained pinyon-juniper sites in Utah. J. Range Management. 26: 440-443.

Gifford, G. F. 1987. Myths and fables and the pinyon-juniper type. P. 34-37 in Everett, R.L. ed. Proceedings – pinyon-juniper conference. USDA Forest Serv. Gen. Tech. Rep. INT_215.

Gifford, G. F. and R. H. Hawkins. 1978. Hydrologic impact of grazing on infiltration: a critical review. Water Resources Research 14: 305-313.

Groves, C. 1994. Idaho's amphibians and reptiles: description, habitat and ecology. Nongame Wildlife Leaflet No. 7. Idaho Department of Fish and Game. Boise, ID.

Haferkamp, M. R., P. O. Currie, J. D. Volesky and B. W. Knapp. 1992. Mortality of crested wheatgrass and Russian wildrye during drought. J. Range Management. 45(4):355-357.

Hockett, G.A. 2002. Livestock impacts on herbaceous components of sage grouse habitat: a review. Intermountain Journal of Science 8(2): 105-114.

Holechek, J. L. 1996a. Financial returns and range condition on southern New Mexico ranches. Rangelands 18(2):52-56

Holechek, J. L. 1996b. Drought and low cattle prices: hardship for New Mexico ranchers. Rangelands 18(1):11-13

Holechek, J. L., H. de Souza Gomes, F. Molinar and D. Galt. 1998. Grazing intensity: critique and approach. Rangelands 20(5):15-18

Holechek, J. L., H. Gomez, F. Molinar and D. Galt. 1999a. Grazing studies: what we've learned. Rangelands 21(2):12-16

Holechek, J. L., M. Thomas, F. Molinar and D. Galt. 1999b. Stocking desert rangelands: what we've learned. Rangelands 21(6):8-12

Holechek, J. L., H. Gomez, F. Molinar, D.Galt and R. Valdez. 2000. Short-duration grazing: The facts in 1999. Rangelands 22(1):18-22.

Holechek, J. L., R. D. Pieper and C. H. Herbel. 2001.Range Management: Principles and Practices, Fourth Edition. Prentice-Hall, New Jersey. 587p

Holmes, A. L., G. A. Green, R. L. Morgan, K. B. Livezey. 2003. Burrowing owl nest success and longevity in north central Oregon. Western North American Naturalist 63(2):244-250.

Hutchings, S.S. and G. Stewart. 1953. Increasing forage yields and sheep production on Intermountain winter ranges. U.S. Department of Agriculture Circular 925. 63p.

Katzner, T. E. and K. L. Harlow. 1998. Long-distance movements from established burrow sites by pygmy rabbits (*Brachylagus idahoensis*) in southwestern Wyoming. Northwestern Naturalist 7:72-74.

Katzner, T. E., K. L. Parker and H. H. Harlow. 1997. Metabolism and thermal response in winter-acclimatized pygmy rabbits (*Brachylagus idahoensis*). Journal of Mammalogy 78(4):1053-1062.

Kay, C. E. and D. L. Bartos. 2000. Ungulate herbivory on Utah aspen: assessment of long-term exclosures. J. Range Management 53: 145-153.

Knick, S. T. and J. T. Rotenberry. 1995. Landscape characteristics of fragmented shrubsteppe habitats and breeding passerine birds. Conservation Biology 9:1059-1071.

Knick, S. T. and J. T. Rotenberry. 1997. Landscape characteristic of disturbed shrubsteppe

habitats in southwestern Idaho (U.S.A.). Landscape ecology 12:287-297.

Knick, S. T., J. T. Rotenberry, and B. Van Horne. 1999. Effects of disturbance on shrub steppe habitats and raptor prey in the Snake River Birds of Prey National Conservation Area, Idaho. Pages 98-99. *In* P.G. Entwhistle and others. Proceedings: sagebrush steppe ecosystems symposium.

Knick, S.J. and J.T. Rotenberry. 1999. Spatial distribution of breeding passerine birds habitats in a shrub steppe region of southwestern Idaho. Studies in Avian Biology 19: 104-111.

Knick, S. T. and J. T. Rotenberry. 2002. Effects of habitat fragmentation on passerine birds breeding in intermountain shrubsteppe. Studies in Avian Biology 25:130-140.

Knick, S. T.,D. S. Dobkin, J. T. Rotenberry, M. A. Schroeder, W. M. Vander Haegen and C. V. Riper. 2003. Teetering on the edge or too late? Conservation and research issues for avifauna of sagebrush habitats. Condor 105:61-634.

Krueper, D., J. Bart and T. D. Rich. 2003. Response of vegetation and breeding birds to the removal of cattle on the San Pedro River, Arizona (U. S. A.). Conservation Biology 17(2):607-615.

Kushlan, J. A., M. J. Steinkamp, K. C. Parsons, J. Capp, M. . Cruz, M. Coulter, I. Davidison, L. Dickson. N. Edelson, R. Eliot, R. M. Erwin, S. Hatch, S. Kress, R. Milko, S. Miller, K. Mills, R. Paul, R. Philips, J. E. Saliva, B. Syderman, J. Trapp, J. Wheeler, and K. Wohl. 2002. Waterbird Conservation for the Americas: the North American Waterbird Conservation Plan, Version 1. Waterbird Conservation for the Americas. Washington, DC.

Lesica, P. and F.W. Allendorf, 1995. When are peripheral populations valuable for conservation? Conservation Biology. 9(4): 753-760.

Lesica, P. and T.H. DeLuca. 1998. Long-term harmful effects of crested wheatgrass on Great Plains grassland ecosystems. Journal of Soil and Water Conservation. 51 (5)408-409.

Loft, E. R., J. W. Menke, J. G. Kie. 1991. Habitat shifts by mule deer: the influence of cattle grazing. J. Wildlife Management 55(1):16-24.

Lusby, G. C. 1979. Effects of grazing on runoff and sediment yield from desert rangeland at Badger Wash in western Colorado, 1953-1973. Geological Survey Water Supply Paper. 1532-1. U. S. Government Printing Office.

Mack, R. N. and J. N. Thompson. 1982. Evolution in steppe with few large, hoofed mammals. American Naturalist 119:757-773.

McLean, A. and A. L. van Ryswyk. 1973. Mortality in crested wheatgrass and Russian wildrye. J. Range Management. 26(6): 431-433.

McLean, A. and E.W. Tisdale. 1972. Recovery rate of depleted range sites under protection from grazing. Journal of Range Management 25:178-184.

Montana Department of Fish, Wildlife and Parks. 1995. Ecological implications of sagebrush manipulation. Montana Department of Fish, Wildlife and Parks. Booklet. 49 pages.

Monsen, S. B. 2000. 1994. The competitive influences of cheatgrass on (*Bromus tectorum*) on site restoration. Pages 35-40. *In* S.B. Monsen and S.G. Kitchen, compilers. Proc. Ecology and Management of Annual Rangelands. Gen. Tech. Rep. INT-313. USDA Forest Service. Intermountain Research Station. Ogden, UT.

Nachlinger, J., K. Sochi, P. Comer, G. Kittel and D. Dorfman. 2001. Great Basin: An ecoregion based conservation blueprint. The Nature Conservancy of Nevada.

Nature Conservancy. 1999. Owyhee Canyonlands. Conservation Focus. (Unpublished).

Neel, L. Nevada Partners in Flight Conservation Plan. 1999.

Nevada Natural Resources Status Report. 2002. State of Nevada. Wildlife and habitat. Plants. Fungi. [available on-line at www.dcnr.nv.gov/nrp01/bio02.html < http://www.dcnr.nv.gov/nrp01/bio02.htm>]

Nevada Natural Resources Status Report. 2002. State of Nevada. Non-native flora and fauna. Non-native flora. Non-native fauna. [available on-line at www.dcnr.nv.gov/nrp01/bio09.htm < http://www.dcnr.nv.gov/nrp01/bio09.html>]

Noss, R. Undated. Ecological effects of roads.

Noss, R.F. 2002. Context matters: considerations for large-scale conservation planning. Society for Conservation Biology. Conservation in practice 3:3 10-19.

Noss, R. F. and A. Cooperrider. 1994. *Saving Nature's Legacy: Protecting and Restoring Biodiversity* . Defenders of Wildlife and Island Press. Washington, DC.

Noss, R. F. and B. Csuti. 1997. Habitat fragmentation. Pages 269-304. *In* G.K. Meffe and C. Carroll, eds. *Principles of Conservation Biology* . 2nd edition. Sinauer Associates. Sunderland, MA

Noy-Meir, I. 1974. Desert Ecosystems: higher trophic levels. Annual Review Ecology and Systematics 5:195-214.

Ohmart, R. D. 1996. Historical and present impacts of livestock grazing on fish and wildlife resources in western riparian habitats. Pages 245-279 in P. R. Krausman, ed., Rangeland Wildlife. Society of Range Management, Denver, CO.

Owyhee Canyonlands Coalition. 2001. Owyhee-Bruneau Canyonlands: Objects of specific interest.

Paige, C. and S. Ritter. 1999. Birds in a sagebrush sea. Partners in Flight, Western Working Group. Boise, ID.

Pellant, M. and C. Hall. 1994. Distribution of two exotic grasses on intermountain rangelands: status in 1992. Pages 109-112. *In* S. B. Monsen and S. G. Kitchen, compilers. Proc. Ecology and Management of Annual Rangelands. Gen. Tech. Rep. INT-313. USDA Forest Service. Intermountain Research Station. Ogden, UT.

Peters, E. F. and S. C. Bunting. 1994. Pages 31-36. *In* S. B. Monsen and S. G. Kitchen, compilers. Proc. Ecology and Management of Annual Rangelands. Gen. Tech. Rep. INT-313. USDA Forest Service. Intermountain Research Station. Ogden, UT.

Peterson, J. G. 1995. Ecological implications of sagebrush manipulation. MDFWP. Wildlife Management Division. 49 pps.. On-line version: www.fwp.state.mt.us/insidefwp/library/sagebrushbulletin.asp < http://www.fwp.state.mt.us/insidefwp/library/sagebrushbulletin.asp>

Pickford, G. D. 1932. The influence of continued promiscuous burning on spring-fall ranges in Utah. Ecology 13 (2): 159-171.

Platts, W. S. 1991. Influence of forest and rangeland management on anadromous fish habitat in western North America. USDA Forest Serv. Gen. Tech. Rep. PNW-124.

Platts, W. S. 1992. Livestock grazing: Influences of Forest and Rangeland Management on Salmonid fisheries and their habitats. AFS Society Publication 19:389-423.

Pyke, D. A. 1999. Invasive exotic plants in sagebrush ecosystems of the Intermountain West. Sagebrush Steppe Ecosystems Symposium. Boise, ID.

Pimentel, D. L. Lach, R. Zuniga, and D. Morrison. Environmental and economic costs associated with non-indigenous species in the United States... http://news/cornell.edu/releases/Jan99/spcies_costs.old.html

Provenza, D. and J. H. Richards. 1984. Interseeding crested wheatgrass ranges. Utah Science. 73-77.

Quigley, T.M. and S.J. Arbelbide, eds. 1997. An assessment of ecosystem components in the Interior Columbia Basin and portions of the Klamath and Great Basins. Gen. Tech. Rep. PNW-GTR-405.

Quigley. T.M. and H. Bigler Cole. 1997.Highlighted scientific findings of the Interior Columbia Basin Ecosystem Management Project. Gen. Tech. Rep. PNW-GTR-404. USDA/USDI. Portland, OR. 34 pages.

Red Willow Research. 2004. Western burrowing owl (*Athene cucularia*) 2004 Nest Site Survey Project Update. Report prepared for BLM Shoshone Field Office.

Red Willow Research. Bird Survey.

Rich, T. D. C. J. Beardmore, H. Berlanger, P. J. Blancher, M. S. W. Bradstreet, G. S. Butcher, D. W. Demarest, E. H. Dunn. W. C. Hunter, E. E. Inigo-Elias, J. A. Kennedy, A. M. Martell, A. O. Panjabi, D. N. Pashley, K. V. Rosneberg, C. M. Rustay, J. S. Wendt, T. C. Will. 2004. Partners in Flight North American Landbird Conservation Plan. Cornell Lab of Ornithology. Ithaca, NY

Ricketts, T.H., E. Dinerstein, D.M. Olson, C.J. Loucks, W. Eichbaum, D. Dellasala, K. Kavanaugh, P. Hedao, P.T. Hurley, K.M. Carney, R. Abell and S.T. Waters. 1999. Terrestrial ecoregions of North America: a conservation assessment. World Wildlife Fund. Washington, DC.

Rosenberg, K. V. 2004. Partners in Flight Continental Priorities and objectives defined at the state and bird conservation region levels. Cornell Lab of Ornithology. Ithaca, NY.

S. K. Rust and C. L. Coulter. 2000. Composition, structure and distribution of Utah juniper plant associations. Cooperative Challenge cost-share Project. IDFG/BLM. Conservation Data Center, Idaho Department of Fish and Game. Boise, ID.

Saab, V. and C.A. Groves 1992. Idaho's migratory landbirds: description, conservation, habits. IDFG Non-game Wildlife Leaflet #10. 16 pages.

Saab, V. and T. Rich. 1997. Large-scale conservation assessment for neotropical migratory land birds in the Interior Columbia River Basin. USDA Forest Service General Technical Report PNW-GTR-399. Pacific Research Station, Portland, OR.

Sada, D. W., J. E. Williams, J. C. Silvey, A. Halford, J. Ramakka, P. Summers, and L. Lewis. 2001. A guide to managing, restoring, and conserving springs in the western United States. USDI BLM. Technical Reference. 1737-17.

Sada, D. W. and D. B. Herbst. 2001. Macroinvertebrates and environmental characteristics of Owens Valley Springs, Inyo County, California (Draft). Report submitted to City of Los Angeles

Department of Water and Power, Bishop, CA.

Sada, D. W. and K. Pohlmann. 2003. U. S. National Park Service Mojave Inventorying and Monitoring Protocols: Level I. Desert Research Institute.

Sharp, L. A., K. Sanders and N. Rimbey. 1992. Variability of crested wheatgrass production over 35 years. Rangelands 14(3):153-168.

Schmidt, L. J. 1987. Present and future themes in pinyon-juniper technology. P. 474-489. In. R.l. Everett, ed. Proceedings – pinyon-juniper conference. USDA Forest Service Gen. Tech. Rep. INT-215.

Schwan, H.E., Donald J. Hodges and Clayton N. Weaver. 1949. Influence of grazing and mulch on forage growth. Journal of Range Management 2(3):142-148

Stewart, K. M., R. T. Bowyer, J. G. Kie, N. J. Cimon and B. J. Johnson. 2002. Temporo-spatial distributions of elk, mule deer, and cattle: resource partitioning and competitive displacement. Journal of Mammalogy 83(1):229-244.

Siegel, N. S., L. A. Shipley and R. D. Sayler. 2002. Ecology and conservation of pygmy rabbits in the shrub-steppe of eastern Washington. Society for Conservation BiologyAnnual Meeting Britain. July, 2002. Abstract.

Soule, M. E. (ed.). 1986. *Conservation Biology: The Science of Scarcity and Diversity* . Sinauer Associates, Sunderland, MA.

Soule, M. 1999. An unflinching vision: networks of people for networks of wildlands. Wild Earth 9(4): 38-46.

Stohlgren, T. J., Y. Otsuki, C. A. Villa, M. Lee and J. Belnap. 2001. Patterns of plant invasions: a case example in native species hotspots and rare habitats. *Biological Invasions* 3:37-50. Kluwer Academic Publishers, Netherlands.

Thomas, C .D. 1993. Extinction, colonization and metapopulations: environmental tracking by rare species. Conservation Biology 8: 373-378.

USDI. BLM/IDARNG. 1996. Effects of military training and fire on the Snake River Birds of Prey National Conservation Area. Res. Proj. Final Report. USDI Geological Services Division. Snake River Field Station. Boise, ID.

USDI BLM. 1999. Owyhee Resource Management Plan. ROD. Lower Snake River District BLM. Boise, ID.

USDA/USDI 1996. Integrated scientific assessment for ecosystem management in the interior Columbia Basin and portions of the Klamath and Great Basins. T.M. Quigley, R.W. Hayes and R.T. Graham, eds. General Technical Report PNW GTR-382. Pacific Northwest Research Station. Portland, OR.

USDA/USDI 1996. Status of the Interior Columbia Basin: summary of scientific findings. Gen. Tech. Rep. PNW-GTR-385. Portland, OR.

USDI BLM. BLM's War Against Weeds in Nevada. [available on-line at www.nv.blm.gov/Resources/noxious_weeds_revised.htm < http://www.nv.blm.gov/Resources/noxious_weeds_revised.htm>]

USDI BLM. 2003. Issuing grazing permits and forage allocations. EA ID-097-03-040. Jarbidge Field Office. Twin Falls, ID.

USDI BLM. 2004. *Sage Notes.*

USDI BLM. 2005. Elko District. Categorical Exclusion. Owyhee sagebrush mowing.

USDI BLM. 2005. Elko District. Spruce Allotment EA.

USDI BLM. 2005. Elko District. Draft Sheep Complex, Big Springs and Owyhee Grazing allotments Sensitive Bird Species DEIS.

USDI BLM. Ely District. Categorical Exclusion. Butte Valley Fire Sciences Project.

USDI BLM. 2006. Winnemucca District. Scoping letter for sagebrush treatments in the Little Owyhee allotment.

USGS. Undated. Great Basin-Mojave Region.

Vale, T. R. 1975. Presettlement vegetation in the sage-bunchgrass area of the Intermountain West. Journal of Range Management. 28: 32-36.

Van Haeveren, B. P., E. B. Janes and W. L. Jackson. 1985. Nonpoint pollution control on public lands. Journal of Soil and Water Conservation. 92-95.

Van Poollen, H.W. and J. R. Lacey. 1979. Herbage response to grazing systems and stocking intensities. Journal of Range Management 32:250-253.

Welch, B. L. and C. Criddle. 2003. Countering misinformation concerning big sagebrush. Research Paper RMRS-RP-40. Ogden, UT. USDA, Forest Service, Rocky Mountain Research Station, 28 p.

Whisenant, S. G. 1990. Changing fire frequencies on Idaho's Snake River Plains: ecological and management implications. In E.D. McArthur, E.M. Romney, and P.T. Tueller, eds. Proceedings of the symposium on cheatgrass invasion, shrub die-off, and other aspects of shrub biology and management. USDA Forest Service General Technical Report INT-276. Intermountain Research Station, Ogden, UT.

Winder, J.A., C.C. Bailey, M.G. Thomas and J. L. Holechek. 2000. Breed and stocking rate effects on Chihuahuan Desert cattle production. Journal of Range Management 53(1):32-38.

Wisdom, M. J., R. S. Holthausen, B. C. Wales, M. A. Henstrom, W. J. Hann, M. G. Raphael, R. S. Holthausen, R. A. Gravemeier, and T. D. Rich. 2000. Source habitats for terrestrial vertebrates of focus in the interior Columbia Basin: broad-sale trends and management implications. USDA Forest Service General Technical Report. PNW-GTR-485.

Zimmerman, G. T. and L. F. Neuenschwander. 1984. Livestock grazing influences on community structure, fire intensity, and fire frequency within the Douglas fir-ninebark habitat type. Journal of Range Management 37(2):104-110.

Zoellich, B.W. 1999. Stream temperatures and elevational distribution of redband trout in southwestern Idaho. Great Basin Naturalist 59(2): 136-143.

OTHER CHEMICALS

We are very concerned about the increased use of various biocides, and occurrence of environmental contaminants on public lands and in water supplies. For example, APHIS has been expanding its acreage of lands sprayed. APHIS is always seeking to expand acres to conduct spraying activities in western states. Vast areas have recently been subject to spraying of insecticides.

It is generally believed that rangeland degradation exacerbates populations of grasshoppers and Mormon crickets, so as more areas of BLM lands become overrun with cheatgrass. More acres are sprayed. Thus, there is co-occurrence, or overlap of lands likely to be sprayed for weeds with APHIS insecticide campaigns.

See:

http://www.agri.state.id.us/Categories/PlantsInsects/GrasshopperMormonCricketControlProgram/Documents/EnvironmentalDocumentation/2007/2007%20MC%20USDA%20APHIS%20EA.pdf

There is also increased awareness of the endocrine-disrupting chemicals, many of them linked to various ag or farming practices. Such chemicals area particular concern in areas with feedlots, dairies, and large marginal irrigated ag land that may also be sprayed. Large industrial livestock facilities frequently are increasingly located in areas away from population centers – and near BLM lands. These have great potential to pollute waterways, including drinking water supplies in streams, rivers, and aquifers, may be subject to pollution and contamination from many chemicals. Wildlife, aquatic species, and humans would thus be exposed to increased chemicals from these sources at the same time BLM greatly increases chemical uses.

See http://www.boiseweekly.com/gyrobase/Content?oid=oid%3A215775 a *Boise Weekly* article:

The potential hazards of EDCs were first discovered in the 1990s among fish and amphibians that gather downstream from sewage treatment plants in Europe. These waters contain abnormally high concentrations of organic chemicals such as steroids, nonprescription drugs, insect repellents, detergents, plasticizers, fire retardants, antibiotics, fragrances and household solvents and their byproducts. Aquatic biologists noticed that wild fish and frogs evidenced significantly increased rates of sex reversal, gonadal cysts and other reproductive tract tumors, dead tissue and decreased fertility. Intersexed or feminized fish, in which males grow both functioning testes and ovaries, have already been caught in rivers in Colorado, Washington state and Virginia, and in Lake Ontario. Because these intersexed characteristics make reproduction difficult, they tend to appear just before fish populations begin to decline.

EDCs are found in herbicides and pesticides, plastics, pharmaceuticals, residues from contraceptives and hormone replacements, cleansers, human waste and pollution from feedlots.

The latter are especially controversial. In 2006, residents in Weiser raised questions about possible contamination of their domestic water supply from hormones and antibiotics used by nearby Sunnyside Feedlots (BW, *News, "Dirty Water," February 1, 2006*). According to state officials, the Idaho Department of Health and Welfare expects to have the results of its study available for public comment in February.

AND:

DDT is one of the most familiar xenoestrogens, but 2,4-D, the most commonly used herbicide in the U.S., and 2,4,5-T, used in Agent Orange, have also been in the news. Dioxins, the byproducts of burning plastics and rubber, are among the most hazardous xenoestrogens.

Researchers worry that policymakers are ignoring the hazards of this little-known pollution.

Jim Nagler Ph.D., an associate professor of biology at Idaho State University, operates a lab that examines the effects of environmental estrogens on fish fertility. He thinks that the issue of EDC leakage or dumpage into state waters should be a priority.

"In terms of what's actually out there, we have no clue, we have no baseline at this point," Nagler says. "What's in the Snake River? What's in the Clearwater River? Who knows?"

Papers written by Nagler and research associates about estrogens and other EDCs suggest that rainbow trout are susceptible to even short-term exposure to the chemicals.

Don Essig, administrator for water quality of the Idaho Department of Environmental Quality (DEQ), acknowledges that it's an emerging issue.

AND:

Whenever offered a glass of water, the great comedian W.C. Fields typically declined, on the grounds that fish have sex in it. But with the increasing spread of a class of chemicals called endocrine disruptor compounds (EDCs) in Idaho's watersheds, some experts wonder if local fish are at risk of losing their sexual and reproductive capacities.

Despite scarce funding, the ramifications for human health still prompt research in this area.

The potential hazards of EDCs were first discovered in the 1990s among fish and amphibians that gather downstream from sewage treatment plants in Europe. These waters contain abnormally high concentrations of organic chemicals such as steroids, nonprescription drugs, insect repellents, detergents, plasticizers, fire retardants, antibiotics, fragrances and household solvents and their byproducts. Aquatic biologists noticed that wild fish and frogs evidenced significantly increased rates of sex reversal, gonadal cysts and other reproductive tract tumors, dead tissue and decreased fertility. Intersexed or feminized fish, in which males grow both functioning testes and ovaries, have already been caught in rivers in Colorado, Washington state and Virginia, and in Lake Ontario. Because these intersexed characteristics make reproduction difficult, they tend to appear just before fish populations begin to decline.

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Now, scientists have evidence that some of these EDCs, called xenoestrogens, might cause conditions such as testicular cancer, urinary tract birth defects, low sperm counts and the premature onset of menses in females among people who regularly drink water with these compounds in them.

Kai Elgethun, Ph.D., Idaho's state toxicologist, says the majority of xenoestrogens come from everyday personal-care products such as soaps, lotions, medications and cosmetics. While xenoestrogens are far less potent than estrogens proper, Elgethun says, they can accumulate in body fat and stay in the system a long time.

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Don Essig, administrator for water quality of the Idaho Department of Environmental Quality (DEQ), acknowledges that it's an emerging issue.

"[It's] probably something we should be paying attention to, but you can't have too many No. 1 priorities," Essig

says.

Instead, Essig says, DEQ concentrates on biological examinations of water, not necessarily a lot of chemical analysis. "I'm sure we're going to be hearing about it more in the emerging future, [but] there's a zillion things out there that we just don't have the budget to study."

Given Idaho's relatively low population density, Essig surmises that Idaho is "probably better off" than more urban states. He attributes much of the contamination to household products such as over-the-counter medications, chemicals, antibacterial soaps and so on.

"The sewage techniques of the day don't treat those things, so they just pass on through," he says.

Essig's outlook differs from that of Boise City's water quality manager, Robin Finch.

"The dirty little secret in all this is that almost 90 percent of all pharmaceuticals manufactured in this country are made for agricultural use, and they're disposed of inside a watershed," Finch says. The issue crosses both municipal and agricultural lines, and demands some level of partnership.

"We need to partner with those guys for the sake of public protection," she says.

Local officials have been tracking the EDC issue since the European studies, but there are "a lot of questions that still need to be resolved before we can launch on this," Finch says.

Although a nationwide study by the U.S. Geological Survey included three Boise River sampling sites, Finch says the matter is "still a very researchy topic at this point."

"There's no standards, no monitoring requirements, no good understanding of threshold effects at either ecological or human health levels," Finch says. "We can identify about 60 to 70 compounds right now that have estrogenic effects, but there's potentially 10,000 out there."

While the USGS study found few target compounds at relatively low or medium concentrations, Finch says that the city is already looking at Seattle's "Flush No Drugs" campaign, which encourages residents to bring their outdated prescription drugs to fire stations for proper disposal, instead of flushing them down the toilet.

The USGS study's one-time reconnaissance of waste compounds in the lower Boise found several endocrine disruptors present, says Mark A. Hardy of the USGS.

The agency also looked for those compounds at several groundwater wells throughout Idaho.

Yet in an e-mail to Trout Unlimited (a trout and salmon conservation organization), forwarded to *BW* , Hardy does not comment on the data or their environmental and human health implications.

Carl Ellsworth, environmental manager of the Boise City Public Works Department, confirms that his department is aware of the EDC issue.

"It's definitely on the radar screen, and it's a pretty high-powered discussion; but our staff follow it, and we've had our consultants look at it," he says.

While there are "no standards yet, and the jury is still out, it's an issue we need to be on top of," Ellsworth says.

But he was reluctant to estimate what it might cost the city to start EDC monitoring because there are "a lot of unknowns and we don't have the answers yet."

The city currently examines its water supply and waste "for metals, phosphorus, fecal coliform, solids, volatile organics--but not on a routine basis," he says. The city relies on subcontractors to do the work.

Local conservation groups have not yet gotten active in this area.

Bert Bowler, native fisheries director for Idaho Rivers United, says that "it's relatively new ... I'm not aware of anything in Idaho going on about it."

Pam Smolzynski of Trout Unlimited agrees.

"This is a little bit cutting-edge for us," says Smolzynski. "People here know about it, but we don't actually track water quality." Much of Trout Unlimited's work focuses instead on watershed and fish habitat restoration. But Jack Williams, a senior scientist for Trout Unlimited, says in an e-mail that his organization has been "asking EPA about what they are doing with endocrine disrupting chemicals, but can't get a reply from them."

For now, state toxicologist Elgethun says that Idaho does not have any particular source of xenoestrogens that is different from other states or greater than other states.

"A greater long-term concern for waters nationwide are estrogens proper, which are present in discharge from most water treatment plants and can be present in discharge from [feed lots]," Elgethun says. There are no EPA standards for estrogens, but there are national drinking water standards for the majority of xenoestrogens.

"This discrepancy is a pressing concern for EPA," says Elgethun.

Whether Idaho's pollution concentrations or sources are different, the Gem State does have extra reason for caution, according to Jim Werntz, director of the Environmental Protection Agency Idaho Operations Office.

"Ninety-five percent of people in Idaho drink groundwater, which is the highest percentage in the nation," Werntz says.

While noting that EDCs are often associated with veterinary drugs from feedlots, Werntz says most of his agency's research deals with surface water and contamination from nitrates.

"There's not enough scientific basis right now for understanding hazards or setting minimum standards of water quality in regards to EDCs," Werntz says.

While standards remain unset, Idahoans continue to drink water and eat fish containing the chemicals.

The public policy implications of endocrine disruptors go even further than that, according to Conrad Volz, a national expert in the field. Volz serves as scientific director for the Center for Healthy Environments and Communities, and is the co-director of the Exposure Assessment and Control Division at the University of Pittsburgh Cancer Institute's Center for Environmental Oncology.

"[Endocrine disruptors] are very important, but remember the wide range of chemicals in everyday use," Volz says in a telephone interview with *BW* . "Whatever we flush down the toilet we wind up drinking, or ends up in the animals that humans are going to be eating. All these chemicals go into our waterways and are not entirely filtered out from the water supply."

Volz's own lab research suggests direct associations between exposure to such chemicals through eating fish flesh and fat. That leads to an increased potential risk for cancer of any tissue that is responsive to estrogen, potentially leading to ovarian, uterine and breast cancer, and potentially some effects on the prostate. All this has far-reaching implications, says Volz, "but what they'd mean is hard to say."

Volz's interest in fish and other species----what he call "bioindicators"--stems from a much wider concern with human health.

"Public health-wise, our biggest problem in the 21st century is water, what's in it, its overuse and nearby land development," Volz says. "In fact, water management policy is a national and even international security policy.

Water is it."

Volz, who advises NATO on peace and security issues, believes that as pure water becomes a scarcer commodity, states should be designating restricted watersheds for strategic reasons.

"We need to be very careful because you cannot divorce the issue of chemicals going into our waterways from land development," says Volz. For example, the kinds of herbicides, pesticides and turf-topping compounds used in new subdivisions contain carcinogens that nonabsorbent pavement shunts away into culverts. Development distribution patterns also require rethinking.

"If we continue to break up our watersheds, we continue to degrade the ability of natural ecosystems to purify our water. There's bacteria that live in topsoil that can help break down these chemicals, but when you develop for thin layers of topsoil, a monoculture of grass instead of native species, and don't allow for larger trees, you reduce the ability of that area to hold and purify water."

Moreover, in the past two years, there has been a large increase in land areas sprayed for West Nile virus in the West, and there is likely to be much more spraying in the future – and it will overlap, or affect in a direct, indirect or cumulative way many of the areas that BLM would use its new and expanded chemical arsenal and applications on.

The indirect and cumulative impacts of this sudden surge in chemical use (APHIS, West Nile), on top of BLM's proposed weed spraying and treatment increase, must be thoroughly assessed – including effects of all chemicals, degradates and contaminants.

Often, the lands that are most likely to require any weed spraying or "treatment" – are disturbed lands, near populations, so the effects of increased weed spraying may overlap or be near the very same lands where grasshopper, mosquito or other spraying may occur.

Attached are two recent APHIS reports – showing large acreages "treated" in recent years, and APHIS seeking to extend spraying into northern Idaho. Please compile all such information for all western states, and be sure that you have adequately consulted over all of these many ongoing or foreseeable treatments and impacts.

Thank you,

Katie Fite
Biodiversity Director
Western Watersheds Project
PO Box 2863
Boise, ID 83701
Katie@westernwatersheds.org

723

"Jordan Valley CWMA "
<jvcwma@qwestoffice .net>
11/29/2009 08:18 PM
Please respond to
"Jordan Valley CWMA"
<jvcwma@qwestoffice.net>

To <orvegtreatments@blm.gov>
cc
bcc
Subject DEIS Comments

November 29, 2009
Bureau of Land Management
Vegetation Treatments EIS
P.O. Box 2965
Portland, OR 97208

Invasive plants in the West have been an increasing problem for many years. Without the use of the more effective chemistries to treat the increasing populations, public lands managed by the Oregon BLM will degrade. We are approaching the point where the increasing invasive weed populations could overtake some areas without the use of better herbicides. The Vale BLM District manages over 70 % of Malheur County and thus impacts the economy and land values of the rest of the County.

The Jordan Valley Cooperative Weed Management Area encourages the adoption of "Alternative 4" as the management plan for invasive weeds in the state. The Jordan Valley CWMA encourages an integrated approach to weed management and this includes the use of the most effective chemicals for the treatment of invasive plants. The adoption of "Alternative 4" would greatly improve the ability of the BLM to do the job of properly managing the land With the use of more effective chemistries, less total chemical will be used with greater results.

The research shows the safety and efficacy of the chemicals to be used. In many cases the newer chemistries are much safer for the applicator and have a lighter environmental impact. The best management for weeds requires rotating chemicals used, and the use of only four herbicides has not allowed that practice.

The Jordan Valley CWMA works with private landowners, State Lands and BLM along with other concerned groups to address noxious weed in the Jordan Valley area of Oregon. We use an integrated approach to deal with weed problems. The adoption of "Alternative 4" will make the treatment of invasive weeds on BLM ground comparable to what the private landowners have been doing to protect their land for years. We would like to see the Oregon Bureau of Land Management have the same ability to care for the land that private landowners do. We would like to see the Oregon Bureau of Land Management have the same access to chemicals that are effective against invasive weeds that private landowners do. We would like to see the Oregon Bureau of Land Management adopt "Alternative 4" and continue to cooperate with the local communities to deal with invasive weed problems.

Thank you for your consideration,

Eric Morrison

Jordan Valley CWMA
Coordinator
P.O.Box 43
508 Swisher Av.
Jordan Valley,OR 97910
Phone: 541-586-3000
Fax: 541-586-3000
email: jvcwma@qwestoffice.net

724

John Segundo
<comendant_256@hotmail.com>
11/26/2009 03:37 PM
Please respond to comendant_256@hotmail.com

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

John Segundo

1609 62nd st, Berkeley, CA
,

725

Jeanne Evans
<ejeanne99@yahoo.com>
11/27/2009 09:40 AM

To orvegtreatments@blm.gov
cc
bcc
Subject Please begin the use of wisdom to tackle problems.

Dear Citizens:

You know, as well as I, that the environment is now saturated and can withstand no more use of poisonous treatments for unwanted plant life. You also know, as well as I, that there are viable alternative methods for these issues.

To think of the bottom line as a dollar amount is ludicrous; the Bottom Line is that our planet is hitting the bottom of Her tolerance for the use of poisons on Her. These toxins also negatively affect the precious lives of everyone everywhere, human and otherwise.

There has been much uproar about the effects of cigarette smoking on our health, including the effects of second-hand smoke. So much so that now this practice is illegal in public places. The use of the poison toxins that you are releasing into the environment parallels the second-hand smoke issue; this must stop immediately.

Please exercise the power you have that affects so many lives in a positive and progressive manner. The wise use of alternative methods is the only sane choice and practice. We and future generations are counting on you to do the right thing.

Bless you and all that you love,
Jeanne Evans
Fellow Citizen

(726)

Dennis Fritzinger
<dennis_fritzinger@haas.berkeley.edu>
11/29/2009 02:51 PM

To "orvegtreatments@blm.gov" <orvegtreatments@blm.gov>
cc Dennis Fritzinger <dennis_fritzinger@haas.berkeley.edu>
bcc
Subject Draft EIS, "Vegetation Treatments Using Herbicides on BLM Lands in Oregon"

Dear Vegetation Treatments EIS Team,

Having studied the proposal and reviewed the proposed alternatives, I observe that they are politically weighted in favor of herbicide use and hence unfairly stacked. If one of the writers was a Buddhist, one or more of the proposals would have been significantly different, due to the Buddhist principle of "do least harm".

The options, except for "no spray", involve use of chemicals that have significant, long-term, and unknown affects on the environment. Persistence in soil, damage to aquatic and soil organisms, by-kill (killing of unintended organisms), the list goes on. If the only damage was to human health and reproductive fitness that would be enough, but the damage goes much farther.

As it is, I can only go with the "no spray" option.

Sincerely,

Dennis Fritzinger

727

"Dee Ann Miller"
<barsbar2@fmtcblue.com>

11/29/2009 05:32 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Fw: Vegetation EIS

----- Original Message -----
From: barsbar@fmtcblue.com>
To: <undisclosed-recipients:>
Sent: Wednesday, November 25, 2009 1:47 PM
Subject: Vegetation EIS

: orvegtreatments@blm.gov
>
>>
>
> Dear Sirs:
>
> We support the Proposed Action, Alternative 4 of the Vegetation
> treatments Draft EIS. We agree that the use of the additional
> herbicides would allow for more effective treatment of noxious and
> invasive vegetation. Medusahead rye is a big threat in our area. It is
> overtaking native ecosystems negatively affecting wildlife habitat,
> livestock and feral horse forage, and increasing fire danger. We are
> actively trying to control the spread of noxious weeds on our private
> property and it would be a great help if the medusahead rye infestations
> on adjacent land under the control of the BLM could be controlled.
>
> Yours truly,
>
>Dee Ann Miller

(428)

Brian Maher
<btmaher@sbcglobal.net>

11/26/2009 08:18 AM

Please respond to
btmaher@sbcglobal.net

To orvegtreatments@blm.gov
cc
bcc
Subject Please Do Not Expose Me to Toxic Herbicides

Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208

orvegtreatments@blm.gov
ed_shepard@blm.gov

Dear Mr Shepard and the BLM,

I greatly value the public lands and watersheds managed by the BLM in Oregon. I am extremely concerned that the BLM is proposing to dramatically expand its herbicide spraying program and as a result place human health, fish, wildlife, non-target plants and water quality at risk.

While there is widespread agreement over the need to slow the spread of invasive weeds on public lands, I oppose the BLM?s proposal to expand its herbicide program to include the spraying of native vegetation along roads and recreation sites. I do not want myself or my family exposed to herbicides when we visit public lands. There is no compelling need to spray native vegetation with herbicides.

I am shocked that the BLM is proposing to spray the compound 2,4-D on public lands. 2,4-D is extremely toxic and exposure to it may result in serious human health effects. The inclusion of this herbicide in your plans makes me doubt the BLM?s commitment to human health.

Please consider alternatives to blanket herbicide spraying. Many Oregonians would like to work with the BLM to manually remove invasive weeds and to leverage funding for low-impact eradication efforts.

I am concerned that the BLM?s proposed approach will place human health and watershed values at risk through overzealous herbicide spraying.

Please develop and implement a more balanced and thoughtful approach to noxious weeds that addresses the root causes of the problem such as inappropriate grazing, road construction and logging activities that spread invasive plants.

Sincerely,

Brian Maher

,

729

barbarahoward@centurytel.net

11/26/2009 07:38 AM

To "BLM" <orvegtreatments@blm.gov>

cc

bcc

Subject Vegetation Draft EIS

Dear Sirs:

We support the Proposed Action, Alternative 4 of the Vegetation treatments, Draft EIS. We agree that the use of the additional herbicides would allow for more effective treatment of noxious and invasive vegetation. Medusahead rye is a big threat in our area. It is overtaking native ecosystems and negatively affecting wildlife habitat, livestock and feral horse forage, and increasing fire danger. We are actively trying to control the spreadof noxious weeds on our private property and it would be a great help if the medusahead rye infestations on adjacent lands under the control of the BLM could be controlled. We are seeing more and more outbreaks of this and other noxious weeds in our area.

Sincerely,

Tom & Barbara Howard

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: JEFFREY NELSON 9412 SE 73rd AVE PORTLAND, OR 97206

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! I SUPPORT ALTERNATIVE ONE: NO HERBICIDES!

730

(731)

OR930 Todd T Ed E

Oregon
Theodore R. Kulongoski, Governor

Department of Fish and Wildlife
Office of the Director
3406 Cherry Avenue, NE
Salem, OR 97303
503.947.6044
FAX 503.947.6042
TTY 503.947.6339
www.dfw.state.or.us

November 24, 2009

Edward W. Shepard
Oregon/Washington State Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208-2965

Dear Mr. Shepard:

The Oregon Department of Fish and Wildlife (Department) has reviewed *Vegetation Treatments Using Herbicides on BLM Lands in Oregon* in the September 2009 Draft Environmental Impact Statement *Summary (DEIS)*, Bureau of Land Management (BLM), and supports the goal to expand the list of herbicides available to BLM to better implement it's noxious weed management program.

In much of the state, noxious weed expansion over the last century has reduced the health of important fish and wildlife habitats by changing habitat composition, increasing wildfire risk, reducing productivity of forestlands, farmlands, and rangelands, accelerating soil erosion, and reducing water quality. Noxious weeds (Invasive Species) are one of the six Key Conservation Issues identified by the Department in the Oregon Conservation Strategy that affect or have the potential to affect many species and habitats over large landscapes and throughout the state. Therefore, it is imperative that public land managers, such as BLM, have the necessary tools available to prevent, contain, and eradicate noxious weeds when and where possible.

After considering the various Alternatives addressed in the DEIS, the Department recommends selection of "Alternative 4: (Proposed Action) – Use 12 (W) or 16 (E) Herbicides to Treat invasive Weeds plus Limited Additional Uses" (see page 9). Alternative 4 would give the BLM a broad suite of more effective herbicides to better implement its noxious weed control efforts and to provide enhanced habitats to meet the needs of Oregon's fish and wildlife resources.

Thank you for the opportunity to provide these comments on the DEIS and the Department recommends the BLM on its effort to more aggressively address noxious weed issues in Oregon.

Sincerely,

Roy Elicker
Director