732

TREE TOP RANCHES

November 19, 2009

US Department of the Interior
Bureau of Land Management
Vegetative Treatment EIS
P.O. Box 2965
Portland, OR 97208

Re: BLM Vegetation Treatments Draft EIS

To whom it may concern:

The purpose of this letter is to voice support for Alternative 4 of the Vegetation Treatments Draft EIS.

We applaud the BLM and the State of Oregon for their primary emphasis on prevention. We also support the use of mechanical means of control where effective. However, species such as medusahead rye and cheat grass are already well established. Further, they have not been controllable by currently-approved mechanical and herbicidal methods.

The rate at which these invasive species are choking out native plants and grasses is alarming, and these infestations have serious environmental and economic consequences.

For these reasons we urge that Alternative 4 be adopted and implemented as quickly as possible. Thank you for your consideration.

Respectfully,

TREE TOP RANCHES, LP

Berry Anderson (WEB)

Berry Anderson
Its Oregon General Ranch Manager

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Bunny Canter 464 S. 57th Pl. Spfld. 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!

733

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: Sasha Rotecki
7131 NE 9th AVE
Portland OR 97211

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734

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: NATHAN HENDRICKS 3157 S.E. FRANCIS ST. PORTLAND, OR. 97202

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735

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Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: Laurie Miller 8741 NE Ward St. Portland OR 97220

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736

737

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.

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.

Sincerel

Gary D Powell
562 A St
Ashland OR 97520

Gary Powell

738

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,

Janese Williams

Janese Williams
160 Church St, Ashland, OR 97520

739

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

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Sincerely,

Harriet Dennis

1330 Ashland Mine Rd, Ashland OR 97520

740

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

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Sincerely,

Jaclyn Hillman

Jaclyn Hillman
109 Pine St.
Ashland, Oregon 97520

RECEIVED
NOV 23 2009

(741)

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

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Sincerely,

Antonette Figueredo
109 Pine St.
Ashland, OR 97520

742

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

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Sincerely, Steven Walters

Steven E Walters
115 Church St
Ashland, OR 97520

(743)

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

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Sincerely,

A N Buck

ARTHUR N BUCK
116 CHURCH ST
ASHLAND, OR 97520

744

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

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Sincerely,

MMitchell-Hooge

(Melissa Mitchell-Hooge)
271 High St., Ashland OR 97520

RECEIVED
NOV 29 2007

(745)

FINAL

November 24, 2009

Todd Thompson
Restoration Coordinator
Vegetation Treatments EIS Team
Bureau of Land Management
PO Box 2965
Portland, OR 97208-2965

Dear Mr. Thompson:

Oregon Department of Environmental Quality (ODEQ) appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM) Draft Environmental Impact Statement (DEIS) for Vegetation Treatments Using Herbicides on BLM Lands in Oregon. The programmatic DEIS addresses the effects of BLM's proposal to increase the number of herbicides from the 4 currently authorized to a total of 18 herbicides and to expand the uses of those herbicides beyond the control of noxious weeds. These herbicides will be used in BLM's existing noxious weeds, invasive plant, and other non-commodity (timber and livestock) vegetation management programs.

ODEQ recognizes that noxious weeds and invasive plant species present significant risks to ecosystem health and effective control mechanisms are needed to restore BLM lands. Together, the DEIS, the referenced BLM national 2007 Programmatic Environmental Impact Statement (PEIS), BLM's Integrated Vegetation Management (IVM), and the Programmatic Environment Report (PER), which covers non-herbicide controls of invasive plant species, identify 5 alternatives to effectively manage unwanted vegetation on BLM land.

The DEIS identifies a range of alternatives from No Action (with no herbicide use) to adding up to 14 more herbicides to the 4 in current use. Specifically, the **current use herbicides** include 2, 4-D, Dicamba, Glyphosate, and Picloram. The **proposed additional herbicides** are Bromacil, Chlorsulfuron, Clopyralid, Diflufenzopyr + Dicamba, Diquat, Diuron, Fluridone, Hexazinone, Imazapic, Imazapyr, Metsulfuron methyl, Sulfometuron methyl, Tebuthiuron, and Triclopyr.

The DEIS proposed action, **Alternative 4**, would add 8 herbicides west of the Cascades and 12 herbicides east of the Cascades to the four already in use. No aerial application would be permitted west of the Cascades. BLM estimates that herbicide use would increase from 16,700 acres per year currently to 45,000 acres per year under the

More information and maps of the affected areas can be found at http://www.epa.gov/espp/litstatus/wtc/maps.htm

6. While ODEQ currently does not have any requirements for the use of the herbicides listed, other than to follow label directions, there a few of the proposed 18 herbicides that are of concern.

7. ODEQ's draft cross-media toxics reduction strategy is an integrated approach to address toxic pollutants in the environment. A draft **DEQ Priority Toxics Focus List (7/27/09)** (available at http://www.deq.state.or.us/toxics/docs/DraftToxicsFocusList.pdf) identifies 2 of BLM's **current use herbicides (2, 4-D and Glyphosate),** and **1 proposed herbicide (Diuron)** as toxics warranting analysis for reduction. The final draft Strategy will be presented to the Environmental Quality Commission for approval. Currently, the goal is to complete the draft Strategy by March 2010.

8. The Environmental Protection Agency (EPA) has developed a list of pesticides designated as Pesticides of Interest (POI)[1] for water quality protection. Oregon's Inter-Agency Pesticide Management Team has begun evaluating the EPA POIs, as well other state-designated POIs, to determine which ones warrant management strategies to protect water quality in Oregon. Pesticides requiring further management are designated as Pesticides of Concern (POC)[2]. Thirteen (13) of the 16 herbicides listed in proposed action, Alternative 4, are considered POIs or POCs by the State Pesticide Management Team. The **13 POIs or POCs are 2, 4-D, Dicamba, Glyphosate, Picloram, Clopyralid, Diuron, Hexazinone, Imazapyr, Metsulfuron methyl, Sulfometuron methyl, Tebuthiuron and Triclopyr.** While none of these herbicides are currently considered POCs in Oregon, BLM should consider this information and various water protection methods when developing and implementing site-specific analysis and decision record under the National Environmental Policy Act (NEPA).

9. The 2007 Oregon Legislature passed Senate Bill 737, which requires ODEQ to develop a list of priority persistent bioaccumulative toxics (Priority Persistent Pollutant (P^3) List) that have a documented effect on human health, wildlife, and aquatic life. ODEQ's Final P^3 List identifies 118 toxic pollutants, divided into two categories (available at http://www.deq.state.or.us/wq/SB737/index.htm). **None of the 18 proposed herbicides are on this list because they do not meet specific toxicity, persistence, and/or bioaccumulation criteria for inclusion.**

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[1] POI is defined as a pesticide that has the potential to occur at concentrations approaching or exceeding a Federal, State, or Tribal human health or environmental reference point.

[2] POC is defined as a pesticide that poses a possible risk to human or ecological life when approaching or exceeding a human health or environmental reference based on water monitoring data.

13. Despite a considerable body of data on acute exposure effects from the proposed list of herbicides, it is important to recognize that the chronic and sublethal risks are not yet well characterized. The historical record of pesticide toxicology reveals many cases of serious and unexpected adverse effects associated with pesticides that were not predictable from standard acute toxicity tests. Because of these unknown risks, we encourage use of non-chemical alternatives with known risks wherever feasible.

14. BLM should coordinate with ODEQ in sending data electronically for potential entry into our Laboratory Analytical Storage and Retrieval Database (LASAR). In addition, ODEQ would like copies of any monitoring reports of herbicide effectiveness and impacts on water quality and ecological conditions.

15. We recommend that BLM establish direct communication with the Public Water System operator or community liaison downstream of the BLM land management areas. There are no requirements to develop or implement "drinking water protection plans" in Oregon, but the communities that elect to move forward voluntarily will request that BLM be involved in the planning and protection of that source area.

16. To prevent or minimize the impacts of herbicides and suspended sediments to public water supplies in Oregon, DEQ and DHS can provide technical assistance and consult with the BLM during the local planning phase of implementation of vegetative treatments. **Generally, ODEQ recommends 100 or 200 feet buffers within 500 to 1,000 feet of a PWS intake**. State agencies can provide site-specific best management practices that can be effective in protecting the drinking water for public intakes and wells. As with all of our state and federal partners, we request that BLM's management alternatives in the municipal watersheds/aquifers should be selected to support the overall goal of providing the highest quality water possible to downstream intakes and wells.

If you have any questions or comments about the DEQ section, please contact Don Yon, Nonpoint Source Coordinator, DEQ, 503-229-6850.

(746)

Joseph Huth
<gartenhut@yahoo.com>

11/28/2009 10:14 AM

Please respond to
gartenhut@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.

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Sincerely,

Joseph Huth

,

747

"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

748

<wildflower26@peoplepc.com
>
11/30/2009 01:07 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject BLMCouponPublicCommnet[1]

Public Comment on Draft Environmental Impact Statement on BLM Herbicides

Dear BLM, my name and address are: _C. Scott, Oakland, OR 97462_____

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!

749

lynne
<lynneismyname @gmail.com
>

11/30/2009 01:08 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Public Comment for Vegetation Treatments EIS team, Herbicide Plan

To Whom it May Concern:

As a federal employee and woman of child-bearing age, I was SHOCKED and APPALLED to learn of the BLM's planned increase in the use of pesticides. Frankly, I was shocked and appalled to learn that the BLM is *already* using herbicides. Such chutzpa! Unacceptable!

I OPPOSE your plan to increase use of pesticides. I STRONGLY 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.

Please consider this to be a "public outcry" against anything other than Alternative 1.

Sincerely,
Lynne S. Erickson, J.D.
2325 Adams Street
Eugene, OR 97405

(750)

Margaret Walker
<youelyoga@gmail.com>
11/30/2009 01:13 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Oregon Herbicidal Mania

Hello,
I am an Earth lover from Florida. I am praying that the Bureau will have the enlightenment and good sense to resist the use of herbicide in Oregon (or any other land management area). You know in your hearts that when you broadcast herbicides you are putting more life at risk than your public relations team assures us.

You know that every plant has value. Even if you want to be selective and weed out some growth, it would be an intelligent boon to the economy to use the funds earmarked for herbicides to pay for human fieldwork where needed.

Please free yourselves from "old think" and be kind to our plants and all other living beings.

Green blessings,
Margaret Walker

751

"Harney County Watershed Council" <Karen.Moon@oregonstate.edu>

11/30/2009 01:41 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Comments on draft EIS

Please accept these comments from the Council

Karen

Harney County Watershed Council
Karen Moon , Coordinator
450 N. Buena Vista Avenue #4
Burns , OR 97720
(541) 573 - 8199
(541) 573 - 8370 fax

Don't get discouraged; it is often the last key in the bunch that opens the lock - *Unknown*

BLM EIS comments.pdf

Harney County Watershed Council

450 N Buena Vista #4
Burns, OR 97720

Phone: 541-573-8199
Fax: 541-573-8370
Karen.Moon@oregonstate.edu

November 30, 2009,

Oregon Bureau of Land Management
Vegetation Treatments EIS Team
PO Box 2965
Portland, OR 97208-2965

To whom it may concern:

The Harney County Watershed Council would like to go on record in support of Option 4 of the Draft Vegetation EIS that has been completed by the Oregon Bureau of Land Management. The Harney County Watershed Council's Mission and Purpose includes restoring and enhancing watersheds within the Malheur Lakes Basin which encompasses all of Harney County and small portions of neighboring counties. One of the major concerns at the Watershed Council is invasive plants and noxious weeds which are taking over rangelands and waterways within our basin. Noxious weeds are threatening the economy and the existence of our ranching way of life.

For twenty five years ranchers and landowners in eastern Oregon have been struggling to battle noxious weeds and invasive plants on private property, only to be re-infested by neighboring public lands. The injunction by the Ninth Circuit Court of the State of Oregon has critically handicapped public land managers in this area of the state costing thousands of dollars and acres lost to species of Knapweed, Pepperweed, Cheatgrass, Medusahead Rye and others.

This EIS addresses concerns that were found lacking by the injunction in 1984. The Watershed Council would like to commend Oregon BLM on the completeness and thoughtfulness that has gone into this EIS.

It is time to move into the present and give the BLM full use of all modern tools available to fight the battle against noxious and invasive plants, to become good neighbors to private citizens and to reclaim acres lost and threatened on all of our public lands.

Sincerely,

Karen Moon

Karen Moon,
Coordinator

A52

taurie@apbb.net
11/30/2009 02:03 PM

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

Requestor: Laurie Woodard
E-mail address: taurie@apbb.net

Comments:
.. My property adjoins BLM land. Depending on the \"alternative\", how will this project affect peoples\' health?

2. Although, my husband and I take care of any noxious weed on our property, we have neighbors who care less. How can BLM prevent noxious weeds spreading from private landowners?

3. Most importantly, there is a LOT of info, in this particular DEIS. Can BLM extend the \"comment period\"?

Thanks.

753

Doug Heiken
<dh@oregonwild .org>
Sent by:
dh.oregonwild@gmail.com

11/30/2009 02:16 PM

To orvegtreatments@blm.gov
cc Jay Lininger <jlininger@biologicaldiversity.org>
bcc
Subject comments on the Oregon BLM Vegetation Treatments DEIS

Please find attached comments on the Oregon BLM Vegetation Treatments DEIS submitted on behalf of Oregon Wild and Center for Biological Diversity. We are also attaching the "Restore Native Ecosystems Alternative" that would best achieve the objectives of this program and should be considered in the FEIS.

Doug Heiken
Oregon Wild
PO Box 11648
Eugene OR 97440
dh@oregonwild.org

541.344.0675 w

Vegetation Treatments (OR) DEIS cmt (OW, CBD).doc

Veg Mgt DEIS Comments (Restore Native Ecosystems Alt).pdf

OREGON WILD
Formerly Oregon Natural Resources Council (ONRC)
PO Box 11648 | Eugene OR 97440 | 541-344-0675 | fax 541-343-0996
dh@oregonwild.org | http://www.oregonwild.org/

Center for Biological Diversity
P.O. Box 1178 | Flagstaff, AZ 86002-1178 | (928) 853-9929

30 Nov 2009

TO: orvegtreatments@blm.gov

Subject: Oregon Wild comments on Oregon BLM's Vegetation Treatments EIS

Dear BLM:

Please accept the following comments from Oregon Wild and Center for Biological Diversity concerning the Oregon BLM's Vegetation Treatments DEIS published in the Federal Register October 2, 2009. Oregon Wild represents about 7,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded. The mission of the Center for Biological Diversity is "to work to secure a future for all species, great and small ... with a focus on protecting the lands, waters, and climate that species need to survive."

We share a desire to avoid and limit the adverse ecological effects of invasive plants, but we think the best way to avoid those adverse impacts is to minimize the business-as-usual land management practices that disturb soil and native vegetation and are the root cause the spread of invasives. The EIS is structurally flawed because it takes existing land management practices for granted and views increased spread of invasives as a given, which leads to an all-but pre-determined decision to expand the use of chemicals to control the invasive scourge.

The preferred alternative 4 would:

- add 8 herbicides west and 12 herbicides east of the Cascades, to the four herbicides already being used to control noxious weeds.
- Added statewide: Clopyralid, Diuron, Fluridone, Hexazinone, Imazapic, Imazapyr, Metsulfuron methyl, Triclopyr
- Added eastside only: Bromacil, Chlorsulfuron, Sulfometuron methyl, Tebuthiuron
- Approved uses of herbicides would be expanded to include:

    - treatment of other invasive plants,
    - treatment of native plants to control invasive pests and diseases;
    - native vegetation control in rights-of-way, administrative sites, and recreation sites, and
    - conduct wildlife habitat improvement specified in interagency conservation plans for rare species,
- 45,100 acres expected to be treated with herbicides annually (16,705 acres expected to be treated annually with methods other than herbicides)
- Treatments would include killing native juniper woodlands because of the perceived unnatural expansion of this species. (5,700 acres annually? p 263)
- 13,600 acres more acres to be treated annually with herbicides than under the existing program, of which 11,000 acres will be imazapic application to control monocultures of invasive annual grasses east of the Cascades
- Aerial treatment of herbicides would be permitted east of the Cascades but not west of the Cascades.
- Mitigation to be applied as described in the Programmatic *Vegetation Treatment Using Herbicides on Bureau of Land Management Lands in 17 Western States EIS and ROD.*

About 1.2 million of the 15.7 million acres of BLM lands in Oregon are currently infested with noxious weeds at some level, and they are spreading at an estimated rate of 12 percent per year.

Eight Purposes to be achieved by the proposal are:

1. Control invasive plant species to protect native ecosystems and the flora and fauna that depend on them.
2. Protect the safety and function of BLM and other authorized infrastructures by controlling encroaching vegetation.
3. Manage native vegetation to provide sustainable habitats for wildlife, fish, and native plants, particularly those included in the Bureau Sensitive Species program.
4. Manage vegetation to reduce the risk that large-scale high-intensity fires will unacceptably damage resources and human developments.
5. Cooperatively control invasive plants so they do not infest or re-infest adjacent non-BLM lands.
6. Prevent herbicide control treatments from having unacceptable adverse effects to applicators and the public, to desirable flora and fauna, and to soil and water.
7. Control plant pests and diseases by removing their native plant hosts when necessary to meet ODA5-identified control objectives.
8. Minimize treatment costs and improve treatment effectiveness, so economic losses from invasive plants and other vegetation growth are reduced and more of the Need can be met within expected funding.

In our scoping letter we asked BLM to describe the effects of alternatives that reflect the [following] priorities.

[S]upport continued strict controls on the use of herbicides on federal lands.

Poisons should only be used as a last resort and only as part of a integrated program that emphasizes prevention and early detection and control.

When they must be used, herbicides should be used in a very limited and targeted way. Not with aerial application but only spot application by hand, and not near water or sensitive native species.

Avoiding activities that spread weeds should be a higher priority, activities that increase soil disturbance and decrease cover of native vegetation are the biggest problems, including: roads, logging, grazing, OHVs, fire suppression, altered fire regimes, and mining.

Fully disclose the weed spreading consequences of land management activities such as logging, roads, fuel treatments, roads, grazing, OHVs, mining, fire suppression, and altered fire regimes. And the consequences of limiting these activities as a way to avoid the spread of weeds.

We urge BLM to consider alternatives to herbicides at all stages of decision-making: program, plan, and project.

Please disclose the identity and environmental impact of all so-called 'inert' ingredients.

Some of these issues do not seem to be well-represented in the DEIS, especially the need to consider alternatives that avoid the root causes of the spread of invasives by avoiding or minimizing activities that disturb soil and native vegetation cover, which are the primary factors causing the spread of invasives.

Margin of Safety: BLM says that EPA is reviewing the safety of some of the herbicides and BLM will stop using them if EPA finds they are unsafe. BLM should shift the burden and stop using chemicals that might be unsafe until the EPA reviews are done and they are proven safe.

Site Specific NEPA: This programmatic EIS does not take care of BLM's duty to describe the site specific impacts of using herbicides. BLM must prepare EAs, not CEs, for all future applications of herbicides under this EIS.

Prevention: The EIS assumes that continued use of the four herbicides already approved would lead to a continuation of the 12% annual rate of spread of invasive species. This fails to account for many things that BLM could do to limit the spread of weeds such as limiting soil disturbance, and limiting native vegetation canopy disturbance.

Weeds will continue to spread under all alternatives. After 15 years under the preferred alternative 20-25% of BLM lands will be infested, and under the no action alternatives 33% will be infested. Neither of these meets the purpose and need. BLM needs to get much more aggressive about limiting mining, logging, roads, grazing, OHVs, fire

suppression, and altered fire regimes, that disturb soil and vegetation and spread invasives.

Effectiveness – The DEIS does not adequately disclose and consider the fact that using herbicides is less effective than other alternatives, because it kills not only the target plants but also often kills non-targets plants, which reduces the cover of desired native vegetation and creates more opportunities for weedy plants to invade treated areas. Hand treating and carefully targeting just the invasive plants leaves more of the native plants in place to reoccupy the site and prevent future establishment of weeds.

Restoring Native Ecosystems Alternative: BLM should consider the approach described in the Restoring Native Ecosystems Alternative which focuses on prevention and restoration http://www.sagebrushsea.org/pdf/weeds/weeds14_RNEA2.pdf Appendix I to the PEIS for the 17 Western States: http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/veis/final_eis_vol_2/final_eis_appendixes.Par.78552.File.dat/Final%20PEIS%20Appendix%20I%20-%20RNEA%20Alternative%20%28June%202007%29.pdf Important parts of this alternative were deemed outside the scope and excluded from consideration in the PEIS, but should be included in this DEIS. The native ecosystems alternative meets the purpose and need better than any of the other alternatives because it avoids the causal actions that would perpetuate the 12% annual increase in invasive species, instead of chasing the weeds around like in the "whack a mole" game.

Other laws: The expansion of invasives species, combined with the expanded use of herbicides, and the various effects of the activities that causes invasives to spread, will cause cumulative effects on listed species, water quality, and cause violations of the Endangered Species Act and Clean Water Act.

Before approving more chemical mixes on public lands, BLM needs to fully disclose the active and so-called inert ingredients of all the approved herbicides, and fully describe their ecological and health effects, both individually and in combination.

Port Orford Cedar: The DEIS (p 128) says that the alternative do not approve the use of herbicides to treat Port Orford Cedar (so-called POC sanitation). We support this limitation. Other options should be preferred such as closing roads, avoiding activities that spread POC root disease, and hand treatment of infected areas.

Sudden Oak Death: The DEIS p 27 says "There are essentially no negative environmental associated with the 250 acres per year of herbicide applications expected to occur under Alternatives 3-5 for Sudden Oak Death." Maybe this statement reflects some kind of unstated weighing of impacts, but this is not appropriate NEPA analysis. Both the beneficial and adverse impacts must be fully disclosed and weighed in the open daylight of public discourse.

Our key concern about Sudden Oak Death (SOD) is that if the outbreak remains small it probably can and should be dealt with using non-chemical methods. And if the SOD

outbreak greatly expands, then the effects of large-scale "scorched-earth" vegetation treatments may become very significant especially if it is accomplished with chemicals. The DEIS p 134 says "If the infestation continues to spread, these acres would be expected to increase." There is a point at which the treatment of the disease may be worse than the disease itself. The EIS does not establish adequate safeguards or thresholds to trigger reconsideration of the scale and methods of treatment as the spatial scale and intensity of SOD treatments expand.

Climate Change – The DEIS discussion of climate change and weeds is interesting as far as it goes, but there are some glaring omissions such as: (A) the effects of compound disturbances such as invasives, climate, herbicides, and all the other anthropogenic disturbances (e.g., logging, grazing, OHVs, altered fire regimes), and (B) the need to consider an alternative focused on prevention, which would be most effective at reducing the adverse effects of invasives, and best mitigate the cumulative and compound effects described above.

Juniper – The DEIS views the expansion of native juniper as a problem, when it is really just a natural and expected result of climate change, livestock grazing, and altered fire regimes. BLM should not expect to change the course of juniper expansion until these other factors are reversed.

The DEIS does not adequately explain the scale of likely juniper treatments. How much juniper killing is anticipated? Since the root causes of juniper expansion are not changing with this decision, does BLM anticipate the need for multiple retreatments as juniper recolonize areas that were previously treated? What are the cumulative impacts of repeated treatments?

The DEIS gives a misleading impression that streams are particularly adversely affected by juniper expansion and will especially improve if we apply chemical treatments to junipers. The DEIS lacks a clear bigger picture of all the things that degrade streams and the many more effective means of improving stream conditions, by for instance, removing or reducing roads, livestock, OHVs, logging, and mining.

Checkerboard – cumulative impacts and drinking water. As pointed out during scoping, there are hundreds of domestic water supplies on or adjacent to BLM lands that are unknown to BLM. Several of the proposed new herbicide applications could introduce toxic chemicals to people's drinking water. The DEIS does not appear to consider this.

Roadside treatments – The DEIS does not adequately acknowledge and address the fact that the way BLM's road drainage system has been engineered, roadsides are really an extension of the stream network. Therefore anything that BLM sprays along roadway has a high change of polluting streams. This is a powerful argument in favor of alternative treatment methods.

Aerial Spray / Regen harvest – The DEIS says that this proposal would not be used to allow aerial spraying on the westside of Oregon. We strongly support this limitation because aerial spraying is a practices widely overused by the timber industry to kill competing native vegetation.

Human Error / Imperfect Control of Application — BLM should not assume that herbicides will always be used according to the label. Humans are fallible. Some people who may apply herbicides on BLM lands may not be able to read and understand what is written on the labels. The NEPA analysis needs to conduct a risk assessment that accounts for the high likelihood of chemical accidents and misuse.

Range of Alternatives Should Addressing Root Causes — The DEIS should acknowledge that conducting business as usual land management, including grazing, logging, OHVs, fire suppression, fuel treatments, altered fire regimes, are a root cause of the invasives problem. Therefore, BLM needs to consider whether the invasive problem can be better addressed by increase the use of herbicides or decreasing these root causes.

Consider the recent study by Dodson & Fiedler (2006) showed that fuel reduction efforts are of particular concern for the spread of weeds because of the large scale of planned treatments and the combined effect of canopy reduction and soil disturbance. Comparing the invasive weed effects of untreated control, thin-only, burn-only and thin-burn treatments, they found that the treatments that were both thinned and burned consistently had the greatest abundance of both exotic and undesirable species, and this pattern was consistent across all scales of analysis. In fact, the thin+burn treatments had almost an order of magnitude higher cover of undesirable and exotic species than an of the other treatments. The thin-only treatment had the second highest levels of exotic abundance. ERICH K. DODSON and CARL E. FIEDLER. 2006. Impacts of restoration treatments on alien plant invasion in Pinus ponderosa forests, Montana, USA. Journal of Applied Ecology (2006) 43, 887–897. http://www.blackwell-synergy.com/doi/abs/10.1111/j.1365-2664.2006.01206.x

See also, Dodson, Erich. Monitoring change in exotic plant abundance after fuel reduction/restoration treatments in ponderosa pine forests of Western Montana. Masters Thesis University of Montana. May 2004.
http://www.fs.fed.us/ffs/docs/lubrecht/Dodson%20Final%20thesis.pdf

> "While the thin-only and burn-only generally showed increases in exotic richness and cover greater than that of the control, adding together the effects of each treatment does not explain all of the invasion observed in the thin/burn, suggesting a synergistic relationship. … In fact, understory productivity in ponderosa pine forests has been shown to be limited by competition from trees for soil nutrients and water, not light (Riegel et al. 1992). When combined, treatments may reach a threshold of resource availability necessary for exotics to invade or establish. Individually treatments may not be sufficiently intense to reach this threshold. There is evidence to support the idea of disturbances (fire and mechanical cutting) acting in a synergistic fashion to promote invasion (Hobbs

and Huenneke 1992). … Moreover, fire may be the type of disturbance that promotes colonization for C. biebersteinii [spotted knapweed] (Sheley et al. 1999). Adding nitrogen to a system, which may occur the first year after burning (Deluca and Zouhar 2000), has been shown to shift the competitive advantage to C. biebersteinii (Blicker et al. 2002)."

Monitoring — The BLM must adopt rigorous monitoring (of implementation, effectiveness and validation) to assure that the scope of herbicide use stays within that described in this EIS and that the application methods and mitigation steps are fully implemented and effective.

Sincerely,

Doug Heiken

Doug Heiken
For Oregon Wild

/s/
Jay Lininger, Ecologist
For Center for Biological Diversity

RESTORE NATIVE ECOSYSTEMS ALTERNATIVE

Submitted to the Bureau of Land Management
Sixteen-state Vegetation Management Plan
Draft Environmental Impact Statement

Revised 26 August 2002
in response to Bureau of Land Management comments
and to conform to the preferred DEIS outline

RESTORE NATIVE ECOSYSTEMS ALTERNATIVE

I. OVERVIEW

GOAL OVR 1: ECOLOGICAL INTEGRITY

Enhance the ecological integrity of BLM land by restoring natural processes, native species, ecosystem function, and resilience of plant and animal communities (see Endnote 1)

Action-OVR 1

Give approximately equal overall effort to vegetation treatments that

a. **Prevent** conditions that favor vegetation problems; and
b. **Restore** ecological integrity on sites with vegetation problems.

Action-OVR 2

Base treatments on the **best available science** and knowledge.

a. Assess the likelihood that a proposed treatment will contribute to long-term ecological integrity, citing documented, relevant case examples where possible.
b. If a treatment has not previously been attempted, cite scientific evidence that the treatment could be expected to contribute to long-term ecological integrity.

Action-OVR 3

State objectives, standards and guidelines in **clear, measurable terms**, then measure the outcomes of treatments so that they can be held accountable to long-term and treatment goals.

Action-OVR 4

Perform restoration in a **precautionary** manner, recognizing that our understanding of complex ecosystems and the consequences of our activities is limited.

Action-OVR 5

Include realistic and dedicated funding for, and an institutional commitment to, **assessment, monitoring and appropriate response** to monitoring results. Design and implement assessment (including the gathering of baseline data) and monitoring systems before activities commence.

Action-OVR 6

Encourage and facilitate **public participation** by local, regional and national stakeholders in such activities as assessment, monitoring, early detection of invading species, provision of new and scientific information, review of assessment and monitoring protocols, and analysis of alternatives for actions.

Action-OVR 7

Provide:

a. clear and significant incentives (e.g., awards, grants, budgets) for prevention of vegetation problems and restoration of ecological integrity; and
b. disincentives for activities that encourage vegetation problems and delay recovery of ecological integrity.

Action-OVR 8

Ensure that treatments are **accountable to public funding.** Rely on best available science, awarding contracts on the basis of "best value" for ecological integrity, avoid treatments of symptoms, and use local community workforces whenever feasible.

II. DEFINITIONS OF TERMS USED IN THE RESTORE NATIVE ECOSYSTEMS ALTERNATIVE

Actions Activities needed to achieve desired outcomes (goals, objectives, standards), including actions to restore or protect land health. These actions include proactive measures as well as criteria that shall be applied to guide day-to-day activities occurring on public land.

Active Restoration Treatments

Actions other than suspension of activities to restore ecological integrity or native species populations. Includes, but is not limited to

1. Road and off-road vehicle route removal
2. Culvert removal
3. Prescribed burning
4. Use of biological control introductions, cultural methods, mechanical methods, chemical methods, and prescribed fire to directly act on invasive exotic species
5. Fish and wildlife habitat rehabilitation
6. Reintroduction of extirpated species
7. Planting and care of native seeds and plants
8. Reintroduction of soil biota required by native species, when necessary
9. Other necessary activities based on priorities established in the ecological restoration assessment.

Conservation Protection of landscape, ecological, and native genetic diversity and the processes that maintain them.

Ecological Integrity 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.

Goals Goals are broad statements of desired outcomes (e.g., maintain ecosystem health and productivity).

Historical Fire Regimes The historical range of variation of fire intervals, seasons, intensities by which native vegetation and wildlife have been shaped and to which they have adapted prior to the arrival of Euro-American settlers.

Invasive Species Exotic species shown by observation and/or scientific evidence to aggressively expand their occupancy of land, whether or not they are viewed as directly impacting economic activities, or have been listed on formal "noxious weed" lists. "Invasive species" does not include native species that increase in response to particular human activities (e.g., juniper, mesquite, sagebrush).

Objectives Objectives identify specific desired conditions for resources and have established timeframes for achievement and are usually quantifiable and measurable.

Passive Restoration Treatments

Suspension of activities that cause the loss of ecological integrity or native species populations in a specific area Passive restoration treatments may include:

1. Area , road, and off-road vehicle route closures
2. Voluntary livestock permit retirement
3. Retirement of vacant livestock allotments
4. Livestock grazing exclosures (e.g., in aggressive weed infestations, uplands "at risk" of weed infestation, riparian areas, habitat of threatened or endangered species, springs, wetlands)
5. Restrictions of logging activities
6. Restrictions of oil and gas and mineral development, including allowing expired leases to remain expired
7. Restrictions on other human activities, as relevant
8. Prescribed natural fire (i.e., allowing fires to burn under predefined circumstances)

Prevention Treatments Actions that avoid causing conditions that favor the presence of invasive species. Prevention is not limited to prevention of the *introduction* of invasive species.

Restoration Actions to regain ecological integrity.

Standards Standards are limitations placed on management activities to ensure compliance with applicable laws and regulations or to limit the discretion authority in project decision-making. Compliance with relevant standards is mandatory.

Vegetation Treatments

Actions which, based on scientific evidence, will:

(1) affect the "conservation and restoration of vegetation communities, watersheds and wildlife habitats." They include:
   (a) prevention treatments that result in
      1. measurable soil, hydrological, and vegetation changes that resist invasive exotic species; or
      2. forests with understory vegetation and fire regimes that resist dense tree growth;
   (b) prevention treatments of vegetation that pose fire hazards to important ecological values or unique ecological features; and
   (c) active and passive restoration treatments that restore native vegetation and/or conditions favorable to native communities.

(2) affect the protection of human lives or property threatened by fuels, via necessary thinning/fuels reduction, or other treatments.

Wildlands-Urban Interface The area next to a home where fires most directly threaten structures and community space where there are flammable community values. Defensible community space should be created (e.g., some thinning) within a treatment zone up to 500 meters (which includes a more intensive home-site treatment zone up to 60 meters) for firefighter safety and protection of other flammable community values.

III. VEGETATION TREATMENT PLANNING

GOAL-PLAN 1

Vegetation treatments are based on assessments of (1) the condition of vegetation; (2) major human causes of degraded conditions of the vegetation; (3) opportunities for prevention of soil disturbance and vegetation problems; (4) opportunities for conservation of native vegetation ; (5) results of past restoration treatments; and (6) comparative likelihood of treatment options for achieving long-term restoration.

Action-PLAN 1

Using existing information initially, map habitats within ecoregions, watersheds, and subwatersheds of the 16 western states:

1. key areas of native vegetation and high ecological integrity; areas of mixed native and exotic vegetation and condition; and areas of low ecological integrity
2. suitable and critical habitat for habitat-specialist terrestrial and aquatic wildlife species
3. suitable habitat for wide-ranging species (e.g., bull trout and sage grouse) that require use of extensive or temporally diverse (e.g., winter/summer habitat) areas within the ecoregion
4. hotspots of plant and wildlife biodiversity
5. habitats "at risk" of further fragmentation or degradation
6. important aquatic areas, such as riparian areas, steep/unstable slopes, wet meadows, and aquatic species' strongholds
7. areas where restoration will increase potential for habitat connectivity
8. areas that could benefit from improved management or restoration to maintain or enhance ecological integrity.

Action-PLAN 2

Consult conservation center databases and other sources of information and scientists on species occurrence. Lack of data may mean no reliable inventories have been conducted.

Action-PLAN 3

Identify spatial and temporal association of particular vegetation problems and compare and contrast with the spatial and temporal occurrence of past and continuing human activities.

Action-PLAN 4

Overlay the ecoregion habitat maps with:

1. a grazing allotment assessment with the goal of phasing out grazing in sensitive areas over time. These include degraded areas, key habitats; and areas where grazing is clearly incompatible with native vegetation and habitat recovery.
2. a logging assessment with the goal of ceasing logging in areas where there is a high risk that it would thwart the recovery of native vegetation or increase existing levels of degradation.

3. a roads and off-road vehicle routes assessment with the goal of closing and decommissioning roads and off-road vehicle routes in ecologically sensitive areas including riparian areas, unstable slopes, sensitive watersheds, and wildlife migration corridors (see Endnote 2).
4. an amphibian assessment. Avoid herbicide use in amphibian habitats, as many amphibians are highly vulnerable to herbicide applications and drift.

Action-PLAN 5

Using existing data, prepare and update every three years, maps of:

1. invasive exotic species concentrations within each watershed and subwatershed.
2. exotic species plantings on BLM lands, and, when available, adjacent private and public lands.

Action-PLAN 6

Prior to implementing site-specific vegetation treatments, prepare goals based on:

1. vegetation conditions, including invasive species concentrations
2. vulnerable wildlife and plant species and habitats
3. habitat important for threatened, endangered, and sensitive species and carnivores; connectivity for habitat-specialist wildlife
4. past and present activities within the watershed leading to vegetation problems
5. passive and active restoration needs
6. feasible restoration goals

IV. SITE SELECTION AND TREATMENT PRIORITIES

A. General

Action-PRIORITIES 1

Prioritize treatments shown to have a high probability of restoring natural processes and natural biotic communities (based on previous experiments or operational use) over treatments without this kind of documentation.

Action- PRIORITIES 2

Prioritize vegetation treatments based on scientific evidence of efficacy as follows:

1. cessation of activities that impede natural recovery (i.e., passive restoration)
2. active restoration treatments that incorporate passive restoration
3. active restoration treatments to restore ecological integrity.

Action- PRIORITIES 3

Vegetation prevention and restoration treatments must utilize:

1. a precautionary approach, which, in the face of uncertain outcomes, proceeds experimentally and cautiously
2. best available science and experiential and indigenous knowledge where applicable
3. an adaptive process that regularly incorporates revisions from monitoring and evaluation
4. a public process
5. the least intrusive techniques available to restore ecological integrity
6. the least risky interventions that are likely to provide the greatest ecological benefit
7. recovery plans for threatened and endangered species, or improvements on such plans

8. prevention strategies to reduce the need for chemical and mechanical treatments, and prescribed fire, so that the number of acres treated annually with these methods will decline over the life of the EIS.

Action- PRIORITIES 4

Herbicide treatments must be of lower priority than non-chemical treatments, and shall be used only in conjunction with:

1. elimination or reduction of the conditions that have favored the presence of invasive species
2. encouragement of conditions that resist invasive species (see Endnote 3).

Action- PRIORITIES 5

Prior to implementing a site-specific treatment:

1. identify and prioritize restoration options
2. select the least intrusive/intensive methods that will effectively move the site toward the stated goals of ecological integrity
3. identify riparian conservation areas, consisting of the riparian community and hydrological energy zones; and an outer zone that provides buffers for the riparian conservation area and considers slope stability and soil erosion.

Action- PRIORITIES 6

State for all site-specific restoration projects and activities:

1. measurable conservation and restoration objectives
2. specific indicators and measures for determining results
3. timelines for analysis of whether goals, objectives and standards have been met
4. decision making processes that will be used to respond to analysis of results.

B. Invasive Species Treatments

GOAL- PRIORITIES 1

The ecological impact of invasive species shall be minimized through conservation and restoration of native vegetation communities, watersheds and wildlife habitats.

Action- PRIORITIES 7

Give priority to two facets of the control of invasive species as defined in Executive Order No. 13112, "Invasive Species":

1. prevent the spread of invasive species from areas where they are present
2. restore native species and habitats to reduce the effects of invasive species and to prevent further invasions.

Action- PRIORITIES 8

Give treatment priority to areas in which exotic plant invasions have adverse ecological impacts on native plant communities, watersheds, and wildlife habitats.

Action- PRIORITIES 9

Develop, with the input of knowledgeable scientists and citizens, a long-term (e.g., 100-year) plan for prevention and minimization of unwanted exotic vegetation within the planning area, and restoration of ecological integrity, including native vegetation. Short-term plans (e.g., 1, 5, or 10 year horizons) will be integrated within the 100-year plan; all shall emphasize experimentation and adaptation.

Action- PRIORITIES 10

The long term vegetation management plan for integrated agency action shall include:

1. identification and lessening of the **conditions** that cause or favor the introduction, establishment, and spread of invasive species, and methods to ameliorate those conditions
2. plans for preservation or restoration of historical disturbance regimes
3. restoration of the native vegetation community, via seeding and planting, to increase resistance to invasion
4. active vegetation treatments to reduce the abundance of invasive exotic species populations.

C. Prescribed Fire, Wildfire, and Fire Suppression Treatments

GOAL- PRIORITIES 2

Natural fire regimes and native vegetation types will be restored, wherever feasible.

Action- PRIORITIES 11

Collect baseline data on historical fire regimes and plant and animal communities to use as a guide for restoration activities.

Action- PRIORITIES 1 2

Base fire management decisions on the 1995 Wildland Fire Policy, the updated 2001 Wildland Fire Policy, and current science. As required by the Fire Policy, create Fire Management Plans for every burnable acre.

Action- PRIORITIES 13

Through an open process that fully includes the public and utilizes the best available science, develop Fire Management Plans that:

1. allow certain remote wildland areas to burn under carefully prescribed conditions where ecological benefits would result
2. prescribe "Minimum Impact Suppression Tactics" where they would be most appropriate
3. prohibit aggressive soil-disturbing suppression methods where they would be damaging (e.g. bulldozers in roadless areas, chemical retardants in riparian areas)
4. determine ecological risks of fire – exotic species, population impacts - in all areas covered by plans, and carefully weigh benefits and risks as part of this process.

Action- PRIORITIES 14

Based on Fire Management Plans, use fire suppression to protect:

1. areas of high ecological values that may be at risk from exotic species invasion following fire
2. areas where human life, developed property or irreplaceable ecological values or cultural resources (e.g., rare forest types, a major portion of the population of an endangered species, or pictographs) are at stake
3. areas that should be protected until prescribed burning or other treatments can reduce excess fuels
4. important wildlife habitats (e.g., within 2 miles of sage grouse leks, big game winter ranges)

Action- PRIORITIES 15

Fire fighting shall be avoided in:

1. areas where nearby natural fire barriers such as bodies of water or rocky ridges are likely to extinguish the fire
2. Wilderness Areas, Wilderness Study Areas, roadless areas/potential wilderness areas, Wild and Scenic Rivers, and Research Natural Areas, except when fire threatens to escape from these areas or permanently impair ecological or cultural values.

Action- PRIORITIES 16

Mechanical fire suppression (i.e., with bulldozers) shall be avoided in riparian zones, steep slopes and other ecologically sensitive areas..

D. Fuels Reduction

GOAL- PRIORITIES 3

Human lives and property will be protected from wildfire and natural processes will be restored.

Action- PRIORITIES 17

Distinguish between fuels treatments intended to restore ecological integrity and those primarily intended to protect property and human life.

Action- PRIORITIES 18

Fuels reduction funds under the National Fire Plan shall be used:

1. only in the wildlands urban interface to protect lives and property
2. for strategic fire management planning and firefighter training to maximize the safety, ecological soundness, and effectiveness of fire and fuels management actions including prescribed fire, wildland fire use, and fire suppression.

Action- PRIORITIES 19

Fuels reduction shall, except for restoration or conservation necessity:

1. minimize or avoid road construction and reconstruction
2. avoid roadless areas, old growth, endangered species habitat, riparian areas, ecological sensitive areas and other areas of high ecological integrity
3. avoid habitat of threatened and endangered species.

Action- PRIORITIES 20

Fuels reduction treatments shall not:

1. increase motorized vehicle use or livestock access
2. supply biomass plants
3. increase fire risk through accumulation of activity fuels
4. include chaining
5. include clearcutting
6. limit native plant recovery through chipping or ground disturbing activities.

Action- PRIORITIES 21

Use positive economic incentives that encourage ecologically based restoration activities and eliminate incentives that encourage activities that are ecologically degrading.

1. contracts for fuels reduction/thinning for wildlands urban interface or restoration shall not include:
    a) commercial timber sales
    b) "goods for services" stewardship contracts

2. all fuel reduction projects shall be paid for by appropriated dollars and any material of commercial value shall be sold in a separate contract and all revenues shall be returned to the treasury or used to support monitoring.

V. PREVENTION VEGETATION TREATMENTS

A. General

Action-PREVENTION 1

The BLM shall not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species unless the agency has determined and made public its determination that the public benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

B. Invasive Species

Action- PREVENTION 2

Develop and implement comprehensive, science-based protocols designed to prevent the spread of invasive species in relation to all activities on BLM lands that have been identified in the scientific literature as primary facilitators of the establishment and spread of invasive species, watershed degradation, and loss of native species.

1. Livestock Grazing

GOAL- PREVENTION 1

The introduction, establishment, and spread of invasive species due to livestock grazing shall be minimized.

Action- PREVENTION 3

Reduce spread of invasive weeds caused by domestic livestock grazing:

1. retire domestic livestock grazing permits at earliest opportunity where grazing has been found to promote invasion or persistence of invasive species
2. prioritize invasives prevention and restoration activities for areas where domestic livestock grazing has been permanently ended
3. manage livestock movement patterns to insure animals are not moving seeds of invasive species from infested to uninfested areas
4. suspend livestock grazing on non-cohesive soils in perennially saturated meadows.
5. manage livestock grazing to favor native species
6. avoid grazing in systems still containing a strong component of native perennials, biological soil crusts, or other features known to act as natural barriers to invasion or increase of invasive exotic species.

2. Roads and Off-Road Vehicles

GOAL- PREVENTION 2

Invasive species introduction, establishment and spread due to road, fire break, and off-road vehicle route construction, use, and maintenance shall be minimized.

Action- PREVENTION 4

Develop GIS maps and databases of all system (authorized and constructed) and non-system (user-created) roads and routes.

Action- PREVENTION 5

Precede all road or off-road vehicle route reconstruction, and any consideration of adding existing or illegal user-created roads and off-road vehicle routes to the transportation system, by NEPA analyses of their impacts, including potential to facilitate the spread of invasive species into native ecosystems.

Action- PREVENTION 6

Close or restrict non-essential, designated routes for motorized vehicle travel in areas of high risk for spread of invasive species.

Action- PREVENTION 7

Implement measures that reduce the likelihood of weed seed dispersal, such as educating equipment operators, implementing appropriate protocols for vehicle and equipment washing, restricting recreational access and seasonal travel. Consider restricting road grading activities in areas with high populations of invasive species.

Action- PREVENTION 8

Implement full area closures that prohibit all motorized travel on lands outside of designated and NEPA analyzed transportation system roads and off-road vehicle routes.

Action- PREVENTION 9

Identify and designate for obliteration non-essential system and non-system roads and off-road vehicle routes that do not comply with native vegetation protection goals.

Action- PREVENTION 10

Cease new road construction and most road reconstruction in riparian areas

Action- PREVENTION 11

Reclaim obliterated roads to native vegetation.

3. Fire Suppression

Action- PREVENTION 12

Utilize Minimum Impact Suppression Techniques and fully reclaim fire lines with native vegetation after fire emergency situations have ended, in order to prevent the spread of invasive species into the disturbed fire line corridors and to prevent the use of fire line corridors as illegal off-road vehicle travelways.

4. Wildland-Urban Interface

Action- PREVENTION 13

Home-site treatments in the wildland-urban interface (e.g., thinning, pruning, and mowing of vegetation) must be undertaken primarily within a 20 - 60 meter (66-200 feet) intensive treatment zone where fires most directly threaten structures and human life.

Action- PREVENTION 14

Defensible community space that may include public and private lands may be created within an additional treatment zone up to 500 meters (which includes the 60 meter home-site treatment zone) for fire fighter safety and protection of other flammable community values.

Action- PREVENTION 15

Treatments to create defensible space may include thinning small diameter trees, pruning, mowing, roof cleaning , as well as replacement of flammable landscape and building materials.

Action- PREVENTION 16

Long-term maintenance activities within the wildland-urban interface (i.e., prescribed burning, mechanical brush removal, etc.) as well as monitoring plans must be considered and a funding commitment secured before any action is undertaken.

Guideline- PREVENTION 1

Management of the wildland-urban interface zone should be a cooperative partnership between relevant agencies, tribes, communities, and homeowners. Cooperation shall extend from the initial risk assessment and following through to future maintenance and should account for appropriate access to structures for fire fighting as well as fire resistant landscaping and consideration of construction standards and proper zoning laws for all land ownerships.

Action- PREVENTION 17

Restoration priorities must be identified through a restoration assessment before any restoration fuels reduction activities take place.

5. Timber

GOAL- PREVENTION 3

The introduction, establishment, and spread of invasive species due to timber sales shall be minimized.

Action- PREVENTION 18

Maintain old-growth vegetation communities as bulwarks of vegetational resistance to invasion; minimize disturbance of old-growth or late seral vegetation communities; and, whenever possible, maintain intact forest canopies adjacent to areas such as roads and clearcuts where invasive species are abundant.

Action- PREVENTION 19

Design and plan timber sales for maximum prevention of introduction, spread, and establishment of invasive species, including pathogens.

6. Altered Hydrological Regimes

GOAL- PREVENTION 4

The introduction, establishment, and spread of invasive species due to altered flow regimes of rivers and streams will be minimized.

Action- PREVENTION 20

Prioritize treatments of riparian areas where restoration is likely to be successful; e.g., areas where the natural historic flow regime is extant.

Action PREVENTION 21

Restore native historical flow regimes whenever it is possible to do so.

7. Oil, Gas, and Mineral Exploration and Development

GOAL- PREVENTION 5

The introduction, establishment, and spread of invasive species due to oil, gas, and mineral exploration and development will be minimized.

Action- PREVENTION 22

Prohibit surface disturbance associated with oil and gas exploration, development, and production activities in areas with

1. endangered, threatened, candidate, sensitive, or rare plant species
2. steep slopes.

Action-PREVENTION 23

Minimize surface disturbance associated with oil and gas exploration, development, and production activities in areas with sensitive soils.

Action- PREVENTION 24

In areas where seismic exploaration activities are permitted best available technologies must be used (i.e. helicopter shot-hole technologies over the use of 65,000 pound thumper trucks.

Action- PREVENTION 25

Locate wells and associated roads and pipelines on slopes less than 25% to avoid or minimize surface disturbance; on slopes greater than 25%, prohibit surface disturbing activities

Action- PREVENTION 26

Keep removal and disturbance of vegetation to a minimum through construction site management (e.g. using previously disturbed areas and existing easements, limiting equipment/materials storage and staging area sites etc.) on both individual well locations and within oil and gas project areas.

Action- PREVENTION 27

Limit vehicular traffic to the running surface of roads and well locations as authorized in Application's for Permit to Drill (APD's) and Right of Ways (ROWs) thus prohibiting all traffic on two-tracks and trails near oil and gas well location and within oil and gas project areas.

Action- PREVENTION 28

Require that all gravel and other surfacing materials used for the project are free of noxious weeds.

Action- PREVENTION 29

Complete a survey for any and all endangered, threatened, candidate, sensitive, or rare plant species prior to allowing any surface-disturbing activities involved with oil and gas exploration, development, and production activities.

Action- PREVENTION 30

Adopt a "No Net Loss" policy for all special status plant species.

Action- PREVENTION 31

Each operator must submit a Surface Use Plan containing appropriate erosion control and revegetation measures (e.g., reintroduction of biological soil crust or mycorrhizae) with each APD request.

Action- PREVENTION 32

Grading and landscaping shall be used during and after construction activities are completed to minimize slopes, and water bars shall be installed on disturbed slopes in areas with unstable soils where seeding alone may not adequately control erosion.

Action- PREVENTION 33

Upon the completion of the drilling phase, require immediate reclamation of all portions of the pad that can be reclaimed using the soils originally removed during construction.

Action- PREVENTION 34

With each APD request, the oil and gas operators must submit a reclamation plan that includes, but shall not be limited to:

1. identification of lands to be disturbed
2. detailed description of the baseline condition and resources on the land including existing uses, soil characteristics, slope, topography, vegetative cover, and productivity
3. methods to control erosion
4. plans to revegetate and restore the areas disturbed
5. measures that address steep slopes, sensitive soils, recontouring requirements, short-term seedbed preparation measures, seeding mixtures and methods, and long-term reclamation goals
6. steps to be taken to comply with federal, state, and local environmental laws, regulations, and policies.

8. Disturbance to Biological Soil Crusts

GOAL- PREVENTION 6

Biological soil crusts shall be maintained as a partial shield preventing establishment or spread of invasive exotic species (See Endnote 4).

Action- PREVENTION 35

Using existing data, map and describe the presence and integrity of biological soil crusts at the ecoregion and watershed levels within the 16 western states; locally develop maps at the subwatershed level.

Action- PREVENTION 36

Prepare and implement a general plan for damaged biological soil crusts.

Action- PREVENTION 37

Prohibit livestock grazing for at least five years following a fire in areas capable of maintaining biological soil crusts. Return of livestock will be delayed past five years if significant recovery of the biological soil crust has not occurred.

C. Prevention of Excess Fuels

Goal-PREVENTION 7

Shrub and tree establishment shall be maintained at historical densities to prevent excess fuels.

Action-PREVENTION 38

Reduce or eliminate livestock grazing in forests and shrublands where:

1. historical grass and forb competition to tree and shrub seedlings density has been or can be diminished by grazing
2. historical understory necessary to carry "cooler" fires has been or can be diminished by grazing.

Action- PREVENTION 39

Exclude livestock for at least five years from forest and shrubland areas following fuels reduction treatments (e.g., burning, thinning), and until pre-determined native vegetation composition, density, and ground cover have been attained.

Action- PREVENTION 40

Allow wildland fire and consider prescribed burning in order to maintain capacity for cooler, understory fires within shrublands and forests.

VI. RESTORATION VEGETATION TREATMENTS

A. Direct Treatments of Invasive Species

Action-RESTORATION 1

Use the least intrusive/extensive/risky vegetation treatment methods to enhance wildlife habitat and populations.

Action- RESTORATION 2

Analyze potential effects of site-specific treatments on an array of species; reliance on assessments of effects only on umbrella species is not sufficient (see Endnote 5).

Action- RESTORATION 3

Direct treatments of invasive species shall be part of an over-all ecologically based restoration plan and may include:

1. Biological control
2. Cultural (manual) practices
3. Mechanical treatments
4. Chemical treatments
5. Prescribed fire

Action- RESTORATION 4

Base the selection of direct treatment methods on:

a. ecological priorities for restoration rather than potential economic benefits
b. size of the proposed treatment area, its location, and the biology of the target invasive species.

Action- RESTORATION 5

Except for treatment of small infestations without motorized equipment, prescribe direct treatments within designated wilderness or wilderness study areas only in conjunction with efforts to halt avoidable spread of invasive species into the wilderness from outside these areas.

Guideline- RESTORATION 1

Adopt the Carhart Model (Arthur Carhart National Wilderness Training Center) for completing minimum requirement analyses and minimum-impact tool analysis. The model assists managers in making administrative decisions concerning wilderness.

Action- RESTORATION 6

Prioritize nonchemical methods, unless shown to be ineffective, over chemical methods.

Action- RESTORATION 7

Small infestations have higher priority for active restoration treatments than large-scale infestations, with the exception of biological control. Use seasonal employees to detect and treat small infestations.

Action- RESTORATION 8

Use only those biological control agents that have been demonstrated to pose no threat to native species.

Action- RESTORATION 9

Use cultural treatments that have been shown effective in restoring native vegetation in scientific studies (e.g., use of properly timed fire, properly timed and managed goat grazing, mulching, and hand pulling) and conduct operational research to develop new, effective cultural treatments.

Action- RESTORATION 10

Plant and seed appropriate native species to compete with exotic species.

Action- RESTORATION 11

Use mechanical treatments that have been shown to be effective in restoring native vegetation in scientific studies (e.g., mowing, spot fire (flamer), mastication, weed eaters, mulching, and weed wrenches) and conduct operational research to develop new, effective mechanical treatments.

Action- RESTORATION 12

For chemical treatments, use application methods that minimize exposure to people, wildlife, and native plants. Spot treatment methods shall be preferred over broadcast methods.

Action- RESTORATION 13

Do not use broadcast herbicide treatments within 500 feet of endangered, threatened, candidate, sensitive, or rare plants. If herbicides are necessary for protection of a rare species, allow only application methods that apply herbicides only to the target plants.

Action- RESTORATION 14

Avoid application of herbicides and prohibit broadcast spraying in riparian conservation areas. Avoid application of herbicides (e.g. atrazine) with adverse effects on aquatic species and amphibians.

Action-RESTORATION 15

Prohibit the use of herbicides in known aquatic and terrestrial amphibian habitat, including breeding, rearing, and overland dispersal areas.

Action- RESTORATION 16

Only herbicides that minimize adverse effects on environmental and human health, based on knowledge of all ingredients in the formulation, shall be utilized for chemical control.

Action- RESTORATION 17

Prohibit use of sulfonylurea herbicides and other acetolactate synthase-inhibiting herbicides due to their demonstrated ability to damage off-site native and crop species.

Action- RESTORATION 18

Design treatments to account for wildlife habitat needs, for instance, by the timing and location of activities. Avoid treatments during nesting season for migratory birds, and during identified sensitive periods for wildlife (e.g., critical wintering habitat for big game or sage grouse).

B. Prescribed Fire

Action- RESTORATION 19

Use prescribed fire to restore native vegetation, historical fire regimes, and native ecosystem; and to mitigate human safety threats, but only in concert with a restoration assessment with clear objectives, and where it will not increase invasive species.

Action- RESTORATION 20

Consideration of the following must be documented prior to prescribed burns, if relevant:

1. long-term damage to biological soil crusts
2. soil erosion through wind and runoff events
3. long-term loss of nutrients from already nutrient-deficient landscapes
4. loss of populations and habitat of special status species
5. risk of spread of invasive species
6. the levels of nuclear testing radionuclides in the immediate and adjacent area
7. interrelation between prescribed burning projects on adjacent Federal/state lands
8. indigenous uses of plants that may be impacted.
9. impacts on air quality
10. lethal effects on mature ponderosa pine, particularly from fire damage of roots

Action- RESTORATION 21

Burned areas (natural or prescribed) must be protected from livestock grazing for at least five years and until measurable recovery criteria are met.

Action- RESTORATION 22

Prescribed burning teams shall:

1. use existing roads
2. limit ground disturbance
3. address risk of fire spreading beyond the project area and onto surrounding lands.

C. Fuels Reduction

Action- RESTORATION 23

Fuels reduction to restore natural fire processes shall be based on comprehensive restoration assessments with clear objectives, in conjunction with other active or passive methods.

Action- RESTORATION 24

Following fire, all standing trees shall be left for wildlife habitat, soil stability, and nutrient cycling, except where removal is necessary to maintain public safety or to restore ecological integrity (e.g., possible removal of small green trees that "should" have burned, so that future fires can burn more naturally).

D. Fire Suppression

Action- RESTORATION 25

Minimize introduction of invasive species during and after fire suppression operations:

1. clean equipment of invasive species seeds before moving equipment off roads to build fire breaks
2. seal all firebreaks to prevent off-road vehicle access.

Action- RESTORATION 26

Minimize post-fire disturbance to burned areas to allow natural recovery.

Action- RESTORATION 27

Monitor all fire camps and helicopter spots for invasive species following fire.

E. Forage Enhancement

Action- RESTORATION 28

Conduct forage enhancement projects only if they incorporate ecological principles to encourage native species, and will not result in any net loss of native plant communities.

VII. REVEGETATION

Action-REVEGETATION 1

In revegetation efforts, whenever it is possible to do so, use native seed and seedlings that have been grown from seeds of locally adapted populations.

Action- REVEGETATION 2

If native seeds/plants are not available, revegetation projects will rarely be undertaken until native plant seed or plants become available. Non-native plant species will be used only in extremely degraded/severely altered systems as an intermediate step toward/placeholder for native restoration, accompanied by a full commitment to complete restoration of native species. This commitment must include funds set aside as part of the project, with specific deadlines for accomplishment.

Action- REVEGETATION 3

When reseeding with non-native species, certification must be provided that only species that have been documented as non-persistent are present in the seeding mixture.

Action- REVEGETATION 4

Assure availability of native seed and plants:

1. establish BLM contracting systems that will provide growers the necessary assurance their native, locally-adapted seed/plants will be purchased if grown
2. establish sufficient storage facilities for native seeds for major revegetation efforts.

Action- REVEGETATION 5

Determine, in landscape, watershed, and subwatershed vegetation assessments, the feasibility of providing habitat for wildlife and plant species that have been extirpated or nearly extirpated.

Action- REVEGETATION 6

Prepare a public report on potential reintroduction of extirpated species, including foreseeable human activities or developments that would foreclose options for such reintroductions.

Action- REVEGETATION 7

Collaborate with federal, state, local and private land managers to reduce sale and planting of exotic invasive species, and increase availability and use of appropriate native species, with particular attention to inholdings and other lands adjacent to BLM lands.

Action- REVEGETATION 8

Focus invasive species public education programs on 10-20 of the most ecologically problematic local invasive species and those that have the potential to invade a given District. Include information about how these species are introduced to public lands.

Action- REVEGETATION 9

Following fire or other disturbances, do not propose reseeding unless it can be shown that natural regeneration is unlikely. Use native species unless they are not available. Always use certified weed-free seed.

VIII. MONITORING AND EVALUATION

Action-MONITOR 1

Before resources are committed to modify a plant community, gather baseline data to reflect existing conditions. If treatments are initiated, data shall be collected to substantiate whether or not any of the goals, objectives, and standards have been met. If baseline and post-treatment evaluation monies are not available, then the project shall not be approved (see Endnote 6).

Action-MONITOR 2

Monitoring must be used to:

1. inventory baseline conditions at the landscape, watershed, subwatershed, and project site levels
2. measure whether positive goals for native ecosystem recovery, conservation, and integrity are being attained
3. track biodiversity and health using an increaser/decreaser species procedure (including biological soil crusts, wildlife, and endemic/sensitive species).
4. practice precaution, retain flexibility, and respond to change, unforeseen harm, failure to reach objectives, and/or new information
5. quantify invasive species population changes
6. establish success/problems with specific prevention and restoration treatments in a variety of sites.

Action-MONITOR 3

Monitoring and evaluation of vegetation treatments shall:

1. relate to the clearly stated objectives of all restoration projects
2. be an integral component of each restoration project
3. be incorporated into the essential costs of each project

4. use scientific principles of experimental design including replication and measurements from untreated control areas for comparison with treated locations
5. use a process responsive to all-party and scientific input
6. encourage involvement of local, regional and national stakeholders
7. be documented in a sixteen-state central database with assessments, objectives, monitoring procedures, and analyses in comparable formats
8. outline clear procedures for responding to monitoring and evaluation results

Action-MONITOR 4

Monitoring methods shall be:

1. Relevant: evaluates progress toward stated objectives
2. Sensitive: quickly detects change, shows trends, identifies critical features
3. Available: inexpensive, easily applied
4. Measurable: accurately quantifiable with acceptable methods
5. Defensible: minimally subject to individual bias
6. Verifiable: allows others applying the same methods to achieve similar results
7. Inclusive: avoids reductionism, where feasible
8. Scheduled: monitoring interval firmly scheduled.

Action-MONITOR 5

Goals, objectives, and standards must be written for all projects tiered to this EIS. All projects must be monitored to determine if their goals, objections, standards, and guidelines are being met on schedule.

Action-MONITOR 6

Objectives and standards must be written in such a manner as to be measurable with concrete ecosystem indicators. Reliance on "professional judgment" without evidence should be minimized, so that conclusions and ecosystem conditions can be independently verified.

Action-MONITOR 7

Each District must prepare an annual monitoring report of all vegetation restoration projects (passive and active). These reports should be available at a central BLM location (see Endnote 7).

Action-MONITOR 8

Each District must annually report whether goals, objectives, and standards are being met. For those that are not being met, indicate plans for meeting them.

Action-MONITOR 9

All proposals to undertake a vegetation restoration activity must include a description of the monitoring that will be necessary to determine the compatibility of the activity with specific goals, objectives, and standards; and the treatment efficacy.

Action- MONITOR 10

Require the submission of an annual monitoring plan at or near any and all locations disturbed by oil and gas activities before granting approval of an Application for Permit to Drill.

Action-MONITOR 11

Annually monitor for five years all firelines, fire camps, helicopter spots, and fire retardant-treated areas for invasive species; eliminate introduced invasive species.

Action- MONITOR 12

Monitor progress toward attainment of long term health and integrity of the watershed, aquatic, riparian, native vegetation and soil resources.

IX. TRIBAL RELATIONS FOR VEGETATION TREATMENTS

GOAL-TRIBES 1

Native American Indian concerns and issues relative to vegetation prevention and restoration treatments are addressed and mitigated in full collaboration with Native Tribal people.

Action-TRIBES 1

Consultation and collaboration with Native Tribes shall take place throughout the process of developing and implementing this EIS in accordance with Executive Order No. 13084, Consultation and Coordination with Indian Tribal Governments.

Action-TRIBES 2

Contact Native Tribal representatives from Tribal governments and organizations when vegetation treatments are being planned. Give particular attention to consultation and collaboration with local Tribal people when activities may affect Native cultural resources, hunting, fishing and gathering areas, sacred sites, or Tribal trust lands.

Action-TRIBES 3

Analyze treatment proposals pursuant to Executive Order No. 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

Action-TRIBES 4

In collaboration with Tribal people, identify culturally significant plants used for food, basketweaving and other fibers, medicine, and ceremonial purposes.

Action-TRIBES 5

Develop protocols for enhancement and protection of culturally significant plants :

1. utilize traditional indigenous knowledge and wisdom to protect and enhance native vegetation communities, native resources, and ecosystems.
2. prioritize treatments that will enhance and preserve culturally significant plants and animals.
3. use minimal impact vegetation treatments where culturally significant species are known to occur. Vegetation treatments will not result in net loss of native species of importance to indigenous people for subsistence or cultural purposes.

Action-TRIBES 6

Establish herbicide-free zones to protect culturally significant plant and wildlife resources.

Action-TRIBES 7

Provide notification to Indian communities of the exact locations, dates, and times that herbicide applications will take place, via letters of notification and posting in prominent locations (such as community bulletin boards and local post offices).

Action-TRIBES 8

Monitor the impacts of different vegetation treatments upon the viability and health of culturally significant plants and animals. Adapt treatment approaches as necessary to ensure culturally significant plant and animal resources are protected for seven generations.

X. COORDINATION, EDUCATION, AND PUBLIC AWARENESS

Action-CEPA 1

Identify activities that prevent, minimize, or reverse (as well as facilitate) the introduction, establishment, spread, and reinvasion of specific invasive exotic plant species (e.g., cheatgrass, ventanata, starthistle) on BLM lands.

Action- CEPA2

Incorporate findings of the analysis (CEPA-1) in all site-specific treatment decisions.

Action- CEPA 3

Develop and maintain a central web site featuring prevention and passive and active restoration treatments, including:

1. scientific literature on treatment outcomes of relevance to BLM lands
2. BLM projects that have resulted in reestablishment of native vegetation, reintroduction of extirpated species, increase in sensitive species populations, reduction in acres needing restoration treatments, or reestablishment of natural fire regimes
3. successful BLM projects or programs to alter activities that have facilitated the introduction, establishment and spread of invasive species.

Action- CEPA 4

Establish annual awards to BLM employees, Districts, and inholding landowners for accomplishments such as:

1. successful passive and active restoration of native vegetation
2. equality of effort to prevention and restoration treatments
3. exemplary monitoring
4. significant involvement of NGOs, students, and other volunteers in conservation and restoration activities..

Action- CEPA 5

Eliminate funding based on acres of vegetation directly treated the previous year without (a) documented alteration of the conditions that favored the presence of the vegetation that was directly treated and (b) restoration programs to restore the site to native vegetation.

Guideline- CEPA 1

Offer simple invasive exotic species reporting forms to BLM lands visitors in order to encourage the reporting of locations in which particular invasive species are present

Action- CEPA 6

Educate the public, including owners of lands neighboring BLM lands, about:

1. the natural role of fire and protecting their homes from fire through the Fire Wise Program
2. prevention of invasive species introduction, establishment, and spread.

Endnotes

1. Vegetation (and thus ecosystem) problems on BLM lands in sixteen western U.S. states include fragmentation; simplified ecosystems; invasive exotic species; altered fire regimes; compacted and otherwise heavily-disturbed soils; and impaired watersheds, with disturbed upland and riparian systems.

2. The three most common activities on public lands managed by the BLM that continue to contribute to declining watershed health are:
   - *Livestock grazing*, which has caused severe, widespread, long-lasting damage to soils, vegetation, riparian areas, streams, and associated species;
   - *Roads,* which damage water quality, riparian areas, the quantity and timing of water flows, aquatic and riparian flora and fauna, and the overall hydrologic and ecological functions of watersheds; and
   - *Logging,* which has contributed to degradation of water quality, riparian areas, soils, vegetation, and aquatic resources.

   These activities lead to elevated sedimentation, degraded soils, degraded riparian areas, and altered stream flows within much of the BLM-managed landscape. Fire in watersheds, a natural process, plays a far smaller role in watershed degradation than these activities.

3. This prioritization is essential, as herbicides can (1) have numerous adverse toxic effects on workers; nearby residents; beneficial soil organisms; and native plant, aquatic, terrestrial and avian species; (2) simplify the vegetation community; and (3) render the treated site more vulnerable to return of invasive species. Herbicides alone do not address the conditions that favor the introduction, establishment and spread of invasive species, and yet they are often used as stand-alone technological "fixes."

4. These crusts of lower plants and cyanobacteria cover soil surfaces between individual plants in healthy arid grasslands, shrublands, and dry woodlands. While they fix nitrogen, increase soil fertility, improve water infiltration, stabilize soils, and enhance the establishment of vascular plants, they also may provide a shield that reduces or prevents establishment and spread of exotic species. Biological soil crusts are particularly susceptible to damage from physical disturbance.

5. An example of the insufficiency of analysis for effects solely on an umbrella species involves sagebrush canopy "thinning" for sage grouse. This may negatively impact nesting cover for migratory bird species of concern.

6. There is an obvious, admitted, ongoing, and institutional failure to adequately monitor, survey, and document the impacts of human activities on habitats, native vegetation, and native wildlife on federal public lands. Even when monitoring has occurred, land managers have rarely translated the findings into management improvements. Good intentions and monitoring plans have been insufficient to direct sufficient funding, staff, or attention to the outcomes of vegetation and other restoration treatments, among other human activities. It is essential that both the continuation and initiation of vegetation restoration activities be dependent upon prior adequate baseline and post-treatment monitoring. "We do what we get funded for" is neither a legally sufficient nor an ecologically responsible approach to the required, continuous, finding of compatibility of treatment activities with the goals, objectives, standards, and guidelines of this EIS.

7. Monitoring needs to be documented so that it can be independently reviewed by non-BLM scientists, the scientifically literate public, and others who are concerned about the ecological health of the nation's federal public lands.

754

compostcavaliere @gmail.com

11/30/2009 02:21 PM

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

cc

bcc

Subject Oregon Vegetation Treatments Draft EIS Comments - Emily Cavaliere

Requestor: Emily Cavaliere
E-mail address: compostcavaliere@gmail.com

I would like to opt out of the email list.

Comments:
I OPPOSE your plan to increase use of pesticides. I STRONGLY 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.

Sincerely,

Emily Cavaliere

(755)

"agreen"
<agreenowc@qwestoffice .net
>
11/30/2009 02:29 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Comments for the EIS

Attached are comments submitted by the Owyhee Watershed Council. Thank you.

Adena L. Green
Coordinator, Owyhee Watershed Council
PO BOX 275
Adrian, OR 97901
541-372-5782
agreenowc@qwestoffice.net

BLM EIS ltr of Support.doc

Owyhee Watershed Council
106 Owyhee Street
PO Box 275
Adrian, OR 97901
Telephone: 541-372-5782 Fax: 541-372-5782
Email: agreenowc@qwestoffice.net

November 24, 2009

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

To Whom It May Concern:

This is a letter of support for Alternative 4 in the Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement.

The Owyhee Watershed Council works with public and private landowners to promote watershed health and develop projects that will improve and protect watershed ecosystems. Ecological damage from noxious weed infestations is often permanent and can affect the entire watershed. Noxious weed management is a priority throughout the watershed.

A large portion of the land within the watershed is managed by the Bureau of Land Management (BLM). The Council in coordination with private landowners, State and federal agencies, the Nature Conservancy and interested parties has established the Jordan Valley Cooperative Weed Management Area that works across state and county lines to manage noxious weeds. Alternative 4 provides the best opportunity to achieve goals set forth by the watershed Council. The BLM has tried to work with the group to control noxious weeds on federal lands but they simply do not have adequate tools for an efficient and economical Integrated Weed Management Program. As it now stands, they are only allowed to use 4 herbicides to treat multiple species of noxious weeds. Multiple species of noxious weeds require a greater variety of herbicides and other management tools.

Thank you for the opportunity to comment and if you have any questions please contact the Council office at 541-372-5782.

Sincerely,

/s/ Adena L Green
Adena L Green
Owyhee Watershed Council, Coordinator

(756)

November 24, 2009

Todd Thompson
Restoration Coordinator
Vegetation Treatments EIS Team
Bureau of Land Management
PO Box 2965
Portland, OR 97208-2965

Dear Mr. Thompson:

The Oregon Department of Forestry (ODF) appreciates the opportunity to comment on the Bureau of Land Management's (BLM) Draft Environmental Impact Statement for Vegetation Treatments Using Herbicides on BLM Lands in Oregon. This alternative is a positive step to expand the toolkit available to the BLM in dealing with key issues such as control of noxious and invasive species and wildlife habitat improvement.

ODF agrees with the BLM's Preferred Alternative 4. This recommendation is supported by policies identified by the Oregon Board of Forestry in the 2003 Forestry Program for Oregon, which documents the board's strategic plan for all Oregon's forests. One of that program's major strategies is to "protect, maintain, and enhance the health of Oregon's forest ecosystems, watersheds, and airsheds within a context of natural disturbance and active management." The strategy applies to public and private forestlands. Specific actions to accomplish the strategy include the following:

1) Promote active vegetation and fuels management to support forest health;
2) Promote forest landscape conditions that are resilient to natural disturbances, reducing adverse environmental impacts and losses of forest resources to damaging agents in a cost effective, environmentally and socially acceptable manner;
3) Encourage state and federal agencies to closely monitor and aggressively act to prevent and mitigate the adverse effects of air pollution and invasive, non-native species on Oregon's forests.

The Board of Forestry has also adopted "best management practices" (BMPs) for forest pesticide use (Oregon Administrative Rules Chapter 620). These rules recognize that pesticide use is a key element in an integrated pest management program, to be used in an environmentally and economically sound manner to meet site-specific objectives. ODF's monitoring data on forestland indicate that if BMPs are followed, pesticides are not injurious to water quality or aquatic organisms. The BLM is further encouraged to engage with and share any water quality effectiveness monitoring data collected in support of this EIS with the Water Quality Management Plan Team (WQMPT). Initiated and led by the Oregon Department of Agriculture (ODA), the inter-agency WQMPT acts to review and respond to pesticide detections in Oregon's ground and surface water as described in the Pesticide Management Plan for Water Quality Protection (see

757

"Susan Hammond "
<SHammond@Centurytel.net
>
11/30/2009 12:45 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject BLM Herbicide Plan--- Comment

Comment from: Hammond Ranches, Inc.
46851 Hammond Ranch Rd.
Diamond, Oregon 97722

Thank you to Leslie for making us aware of the "Plan" that is available for Public Review.

The state of Oregon has many attributes that are vegetative in nature. The protection of these esthetics and the economic returns from productive vegetation is the essence of the economic and ecologic viability of the State.

For a Federal Agency to be crippled by overachieving pesticide restrictions with no accountable reasoning, is threatening private property and all other agency responsibilities. To have a Federal agency with management responsibilities and qualified applicators not be able to use the tools available to other land managers is totally unaccountable.

Noxious weeds and other invasive plants whether native or introduced should be able to be treated as promptly as the problem is identified; at least to the extent of the use of the 18 herbicides approved for use on other BLM lands within the U.S.

The Co-operative Management Agreement between the Steens Mountain Landowners Group and the BLM cannot be serviced with the current herbicide restrictions in place.

Taking into consideration the Draft EIS, it seems either Alternative 5 or Alternative 4 would create a workable "Plan" for the use of herbicides for the future.

Thank you for considering our in-put.

Susan A. Hammond for Hammond Ranches, Inc.

758

jpwhite@fs.fed.us
11/30/2009 03:24 PM

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

Requestor: Joshua White
E-mail address: jpwhite@fs.fed.us

Comments:
The DEIS is very thorough and the reasoning behind the proposed action is clear-cut. The fifth alternative while attractive, due to a greater suite of available chemicals, needlessly adds these herbicides without an increase in program efficiency or cost effectiveness. The alternatives 1 and 2 would not reduce invasive species or the BLM's reliance on herbicides, and would likely increase them both. The estimated rate of invasive plant spread is 12% in the western United States, so an effective program must treat enough infestations to reduce this number in the future. Only alternative 3 and the proposed action meet this criterion, but alternative 3 does not allow for treatment of plants other than those listed as noxious weeds. The ability to treat other types of vegetation is important for the maintenance of sensitive habitat; and only the proposed action allows the BLM to effectively treat noxious weeds, in the most cost effective manner, and manage other vegetation for the improvement of sensitive habitat.

759

Rebecca Lerner
<rebeccaelerner@gmail.com
>

11/30/2009 03:50 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Consider foragers when you think of herbicides!

Dear Oregon Bureau of Land Management officials,

As an avid forager who is getting increasing media attention about wild food, I urge you NOT to use herbicides. People are more interested than ever in foraging for food and medicine, and they generally begin in the most accessible places -- exactly the same places the BLM is proposing to poison with herbicides. This would create a massive public health crisis, in addition to hurting animals and non-target plants. Many of these invasive species have value for us. Please consider the impact on the public and look to alternatives.

Sincerely,

Rebecca Lerner

--
Rebecca Lerner
Journalist, Urban Forager
Portland, OR
www.FirstWays.com
Cell: (503) 956-9264

760

ed cooley
<edcooley@rosenet.net>

12/01/2009 08:44 AM

Please respond to edcooley@rosenet.net

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

Please don't go backwards in our efforts to make our environment better. Our entire home watershed is on BLM land. We get our drinking water from there. We breath the air that smells bad when spraying is done in our neighborhood so we know that what ever is being sprayed is getting on us.

Your forest practices of clear cutting allows invasive species to get a foothold necessitating the thinking that results in herbide spraying. These invasives don't stop at the boundaries of the BLM. Change your logging management and weed problems will be lessened.

I spend time near my house hiking in BLM lands. I don't want to be exposed to strange chemicals when I do.
Ed Cooley

POBox 642

Elkton, OR 96436

761

CRAIG M PATTERSON
<craigmpatterson@msn.com>

12/01/2009 08:26 AM

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

Dear BLM,

I strongly oppose all spraying of herbicides, pesticides or fungicides until two conditions are met.

1) That you first adopt the precautionary principal where you must definitively prove your chemicals do no harm to the web of the ecosystems and be held responsible and accountable for all and any negative consequences for 7 generations to come.

2) That your research has done an exhaustive study on the potential symbiotic interdependent consequences of these chemicals in the landscape.

Until you have proven these two conditions, I will oppose your proposal.

Please address the following in your response:

The following herbicides are assessed by the Bureau of Land Management and the Forest Service to be of the greatest risks to human health of those proposed for use: bromacil, diuron, tebuthiuon, diquat, 2,4-D, Hexazinone, and Triclopyr. Clopyralid and Picloram pose a potential cancer risk through contamination with hexachlorobenzene. 2,4-D, bromacil, diuron, tebuthiuron, and diquat pose risks to workers even at typical application rates.

Here's an example of the kind of human health risks one herbicide can present: "Pilots and aerial mixer-loaders face a risk for systemic, reproductive, and cancer effects from typical and maximum exposures to bromacil. Backpack and hand applicators, and ground applicators, mixer-loaders, and applicator/mixer-loaders are also at risk for systemic and reproductive effects from maximum exposures. Risks for systemic, reproductive, and cancer effects to wokers and the public are associated with accidental scenarios of spill to skin..., direct spray...., consumption of fish from a directly sprayed water body..., consumption of directly sprayed berries..., and drinking water contaminated by a truck spill or a jettison of mixture..." (BLM EIS p. 316 - no cancer risk cited for all by spills to skin exposure)

The variety of risks from diuron and tebuthiuron read similarly. Diuron is a suspected carcinogen and possible endocrine disrupter. The Natural Resources Defense Council has petitioned the EPA to cancel all registrations of the herbicide formula ingredient 2,4-D and all allowances for presence in food or water due to the EPA's failure to consider 2,4-D's effects of endocrine disruption, neurotoxicity, mutagenicity, increased

skin absorption under common conditions, and adverse developmental effects at doses below those in the EPA risk assessment for exposure of infants to 2,4-D in breast milk. (EIS p. 91) For applications at maximum rates or in accidental spill scenarios, the following herbicides also pose "low" to "high" risks to workers and the public" fluridone, chlosulfuron, clopyralid, and glyphosate. (EIS pp. 314-317)

The BLM admits that there would be less adverse effects to the public with only using non-herbicide methods and that they are already using non-herbicide control methods (weed-pulling, mowing, burning, grazing, etc.) for invasive plants over 716 acres and for native plants (eg. poison oak) over 400 acres. Yet the BLM plans to increase use of herbicides in recreational sites (campgrounds, rafting put-ins, viewpoints, Wilderness Areas, etc.) and thereby increase the potential for accidental exposure of recreationists and herbicide applicator workers to toxic chemicals. Popular berry-picking areas, commercial and recreational mushroom gathering areas, and Native cultural plant gathering areas could also be sprayed with toxic herbicides.

Aerial spraying of herbicides poses a greater risk to the public (as well as to crops, native plants, water quality, fish, and wildlife) due to off-site drift, yet the BLM still proposes it, only completely banning aerial use of dicamba with diflufenzopyr and sulfometuron. This allows aerial spraying of other herbicides highly toxic to humans such as 2,4-D and tebuthiuron. In Idaho in 2001 a "by the books" typical aerial spraying of sulfometuron methyl resulted in severe damage to thousands of acres of adjacent farmland crops the following year. (EIS p. 86) The EPA is considering prohibition of its use within 100 feet of water and in situations typical of dry Eastern Oregon (low annual rainfall and powdery dry soil or light sandy soil), suggesting that aerial spraying of the potent ALS-inhibiting herbicides should be prohibited. Aerial spraying should be avoided in general. Boom broadcast applications such as by ATV's are more hazardous to the public, fish, water quality, crops, and native plants than spot-spraying, yet spot-spraying is more risky to the workers, indicating the need to avoid the use of the most toxic herbicides. Children are at greater risk than adults.

DRINKING WATER, STREAM, AND FISH CONTAMINATION:

Glyphosate can persist in the bottom sediments of aquatic environments with a degradation half-life of 12 days to 10 weeks. Recent studies detected solution phase glyphosate in 36% of 154 stream samples, and its acid degradation product in 69% of the samples. Glyphosate formulas with polyethoxylated tallow amine (POEA) surfactant is considerably more toxic to aquatic species – including fish- than other formulas. Yet glyphosate is registered for aquatic use and would be applied to wetlands and aquatic plants emerging from the water. (EIS p. 163)

Bromacil is mobile in soil, has a high potential to leach into groundwater, and is a known groundwater contaminant. (EIS p. 164) Chlorsulfuron is persistent in soils, has a long potential half-life in water (24 days to more than a year) and has high potential to leach into groundwater. Dicamba is mobile in soil, can contaminate surface water and

has high potential to leach into ground water. It is a known groundwater contaminant in Delaware, Maryland, and Virginia.

The EPA has set health advisory concentration levels for dicamba but has failed to set maximum concentration limits for drinkable water. The EPA recently placed diuron on the drinking water contaminant candidate list (EPA 2008) yet the BLM is still proposing its use. Known aquatic dissipation half-lives of diuron range from 3 to 177 days. Movement through soil is known to have transported diuron and its metabolite to a stream and adjacent shallow groundwater. (Field et al 2003, EIS p. 165) :

Hexazinone and its degradates persist, are highly mobile, and are readily washed into surface waters. Hexazinone has been identified as a groundwater contaminant in seven states. The EPA requires a groundwater advisory on all product lables states that hexazinone should not be used on permeable soils. In areas where irrigation water is contaminated with hexazinone or where groundwater discharges to surface water, hexazinone residues in water could pose a threat to plants." (EIS p. 165)

Hexazinone has been detected in streams near terrestrial application sites up to 30 days after application and reported in run-off up to 6 months post-application in a forest dissipation study. (Neary and Michael 1996; Michael et al. 1999, EIS p. 165) Potential for displacement of hexazinone and consequent impacts to crops or native plants seem too high for the BLM to be using it.

Imazapic is a new herbicide which has received little study. The herbicide label for the "Plateau" formula in which imazapic is the active ingredient, indicates that imazapic is a groundwater contaminant. (BASF 2004, EIS p. 165) Metsulfuron methyl has high potential to leach into groundwater but so far is not a reported groundwater contaminant according to the EIS. The three added herbicides – bromacil, diuron, and tebuthiuron- proposed for use in alt. 4 (but not alt 3) are all known groundwater contaminants.

Alt. 5 would add the use of diquat, a known groundwater contaminant that can de-oxygenate water if applied in large areas of water, hurting fish and other aquatic species. Yet this destructive herbicide is proposed for use largely to control Giant salvinia, which is not even known to occur in Oregon, which appears to be outside of its ecological habitat range. Alt.s 4 and 5 would also apply herbicides to more roads and rights of way.

As the EIS admits: "As more roads and rights-of-way (and thus more ditch lines) are treated, there is more potential for herbicide to enter water... bromacil, diuron, and tebuthiuron... are all persistent and mobile herbicides." (EIS p. 174) "Picloram can move off site through surface or subsurface runoff, and has been detected in the groundwater of 11 states (Howard 1991). Picloram... is not degraded rapidly in the environment (Tu et al. 2001). Concentrations in runoff have been reported to be great enough to damage crops, and could cause damage to certain submerged aquatic plants (Forsyth et al. 1997 cited in Tu et al. 2001)... the EPA reported it stable to hydrolysis and unlikely to degrade in ground water, even over several years (EPA 1995). Maximum picloram runoff generally occurs following the first significant rainfall, after which

runoff concentrations drop to levels that persist up to 2 years post-application." (EIS p. 166) The toxicity, high mobility, and high persistence of picloram have caused us to advocate for prohibition of its use.

I patiently await your response.

Sincerely,

Craig Patterson

762

anyu@sonnenkinder.org
12/01/2009 06:01 AM

To orvegtreatments@blm.gov
cc
bcc
Subject Use of herbicides

Dear Oregon Bureau of Land Management officials,

As an avid forager who loves wild plants, I urge you NOT to use herbicides. People are more interested than ever in foraging for food and medicine, and they generally begin in the most accessible places -- exactly the same places the BLM is proposing to poison with herbicides. This would create a massive public health crisis, in addition to hurting animals and non-target plants. Many of these invasive species have value for us. Please consider the impact on the public and look to alternatives.

Sincerely,

YOU

Niko Cremer
--

763

echo@riseup.net
12/01/2009 05:32 AM

To orvegtreatments@blm.gov
cc
bcc
Subject No increased herbicide use on our public lands.

To whom it may concern.
Water dependent species will be irreparably harmed by all action alternatives and herbicide use should be phased out, not tripled.

Sincerely,
John Felsner

764

Eric Shamay
<eric.shamay@gmail.com>
11/30/2009 08:51 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Comment on the Proposed Herbicide Spraying Throughout Oregon forests

To whom it may concern,

I OPPOSE your plan to increase use of pesticides. I STRONGLY 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.

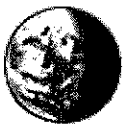
I protest the fact that your DEIS did not include an analysis of the inert ingredients and relied on a Bush-Administration legal definition of the term "drift" that eliminated the consideration of vapor as "drift."

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.

Eric Shachar Shamay
2325 Adams St.
Eugene, OR 97405

765



Fred Otley
<fredotley@hotmail.com>
11/30/2009 08:40 PM

To <orvegtreatments@blm.gov>
cc <ocrowleys@hughes.net>
bcc
Subject Response to Vegetation Treatment DEIS

Windows 7: I wanted simpler, now it's simpler. I'm a rock star. O'CrowleyWeedLetter.doc

December 1, 2009

To whom it may concern,

The following are my comments concerning Vegetation Treatments using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement.

In my five years managing a 49,000 acre area of mixed private and BLM land I have seen a large increase and spread of medusa head. This occurred while we were intensively monitoring and spot spraying all medusa head patches on private land. The patches on adjacent BLM land have multiplied and gotten bigger with the outside boundary of the medusa head patches moving five to seven miles outward. This is negatively impacting our control efforts on private land.

The unchecked spread of medusa head on BLM ground will have a large negative effect on many things including, wildlife, wild horses, watershed conditions, wild fire hazards and related ecological conditions, and livestock grazing which is my livelihood. As an example, the area I am talking about is very diverse with many different sagebrush communities, other shrubs, forbs and grass species. The many different sagebrush communities including low sage, basin sage, and mountain sage brush are valuable for sage grouse, mule deer, antelope, and many other wildlife species.

The aggressiveness of medusa head in these communities is changing the make up and overall health of these important areas. Because medusa head is so effective in establishing in these well managed and healthy upland and riparian areas, the weed aggressively takes them over and dominates. The result is a monoculture of medusa head which is of no forage value to wildlife, wild horses, or livestock.

It is also causing a shorter and hotter fire cycle that prevents sage brush and other native plants from re-establishing after a fire, so many important communities are at risk or even eliminated. In addition, this fire risk in essence eliminates the positive aspects of natural fire cycles. The result of medusa head encroaching on these areas creates a severe annual risk of wild fire.

Within a few years, and I mean less than ten years, a large portion of the Steens Mountain Wilderness and surrounding habitats will be dominated and /or replaced by medusa head. The direct ecological/economical cost and direct management costs will increase exponentially each year that we do not have a way to manage or control medusa head weed populations on BLM land.

In summary, the passage of the purposed action in this DEIS is a win-win for all sides of BLM land use, management, and protection.

Sincerely,
Tim O'Crowley
49030 Clemens Ranch Rd.
Diamond, OR. 97722
(541) 493-1164

766

Fred Otley
<fredotley@hotmail.com>
11/30/2009 07:50 PM

To <orvegtreatments@blm.gov>
cc <ocrowleys@hughes.net>
bcc
Subject Comments on Vegetation Treatment DEIS

Diamond Weed Management Area.doc

Date: December 1, 2009

To: Vegetation Treatment EIS Team
Att. Edwward W. Shephard
BLM State Director
P.O. Box 2165
Portland, OR 97208-2965

From: Diamond Valley Weed Management Area
Tim O'Crowley, Acting Chairman
49030 Clemens Ranch Road
Diamond, Oregon 97722
(541) 493-1164

Subject: Comments concerning Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement.

The importance of the above DEIS cannot be overstated. Being able to use all available herbicides that effectively control or manage medusa head and other weed species is vital to ecological, economic, watershed, wildlife, wild horses, livestock grazing, public use, recreation and other important resources. The existing situation of uncontrolled medusa head spread on BLM lands is increasing at an exponential rate as is the resultant damage to environmental conditions.

It is vital to our area and ongoing control efforts by our groups to give BLM the use of proven management practice and herbicides. BLM lands are intermixed with private lands and cooperative management efforts by BLM and private landowners is very important and dependent upon specified herbicides described in the draft EIS.

The proposed action is important to sage grouse dependent sagebrush habitat and riparian areas. Medusa head is rapidly invading and dominating sagebrush habitats in healthy well managed plant communities, permanently damaging and destroying these important habitats. Medusa head competes with forbs, other shrub and grass species negatively impacting and in many cases totally dominating these communities.

The risk to many habitats are large and critical to our cooperative efforts on private lands. Private landowners are monitoring and cooperating with BLM on controlling medusa head on private lands and prevent the spread to adjacent and intermixed BLM lands. The use of herbicides such as Plateau is a proven management tool and is vital to our efforts and vital to use on BLM lands.

Medusa head creates an annual risk of wild fire due to the chemical and physical properties of this high priority noxious weed. This annual grass has flash fuel properties that put important habitats at risk. Cooperative landscape ecological and watershed management projects are also at risk due to medusa head spreading on BLM lands.

Wildlife habitats of many different types are at risk if BLM and private landowners are not successful in medusa head control efforts. Wild horses will be negatively impacted as will livestock grazing with dramatic economic and ecological costs.

In summary all of the proposed herbicide uses described into the DEIS an important management tools to protect BLM and public lands. We are in support of the proposed action in the DEIS because federal, county, state and private parties throughout Oregon are working together to organize cooperative management programs and integrated efforts to protect public and private lands.

The undersigned private individuals are members of Diamond Weed Management Area and are in support of DEIS.

Tim O'Crowley
Susan O'Crowley
Seth O'Crowley
Earl Carson
Shirley Carson
Dan Otley
Katie Otley
Larry Otley
Sue Otley
Dave Thompson
Bill Otley
Dick Jenkins
Marvin Jess
Rod Otley
Debbie Otley
Rich Jenkins
Don Davis
Larry Dunn
Brian Dunn
Todd Carson
Annette Carson
Fred Otley
Debbi Otley
Harold Otley
Mary Otley
Mike Largent
Dan Nichols

767

cari eisler
<cari@peoples.coop>
11/30/2009 06:16 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Increasing herbicide use in Oregon

Oregon Bureau of Land Management,

Pesticide use on BLM land should under no circumstances be allowed to increase the toxicity of our soil or water. The increased risk to human,wildlife and native plant health because of the dispersal or presence in the water table can not be justified by the inconvenience or expense of non toxic methods of plant removal. As someone who uses the forest for recreation as well as gathering wild foods I would feel that one of my food sources was potentially contaminated and my source of renewal despoiled. How can good management of our lands include the poisoning of life, including life in the soil that we are only now learning more about. It seems that a more forward looking solution would be to create jobs that used the tools of physical removal. Or the use of volunteer groups that would adopt an area for non-native species removal. Please be creative and not destructive as you look for solutions.

Thank you, Cari Eisler

Oregon resident

(768)

Katie Fite <katie@westernwatersheds.org>
11/30/2009 07:35 PM

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

Boy, is this a piece of shit. All lipsticked over.

I want the actual use – by year. I et the 70s-80s data is a range con doodling.

ALL based on 2001 data.

On 11/26/09 5:50 PM, "Katie Fite" <katie@westernwatersheds.org> wrote:

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.

Same as previous Letter

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,

Katie Fite
Western Watersheds Project
PO Box 2863
Boise, ID 83701
208-4291-1679

709

"Sharon Johnson"
<countycourt@co.harney.or.us>
12/01/2009 09:15 AM

To <orvegtreatments@blm.gov>
cc "'DAN NICHOLS'" <dannichols@wildblue.net>
bcc
Subject Comments from Harney County Court

Please see attached comments.

Sharon Johnson
Harney County Court
450 North Buena Vista
Burns, Oregon 97720
Phone: 541-573-6356
Fax: 541-573-8387
www.co.harney.or.us
www.harneycounty.org

Dan Nichols - Veg EIS 11-29-2009.doc

HARNEY COUNTY COURT

Office of Dan Nichols, Commissioner

450 North Buena Vista, Burns, Oregon 97720
Phone: 541-493-2440 Fax: 541-493-2440
E-mail: dannichols@wildblue.net
Websites: www.co.harney.or.us ♦ www.harneycounty.org

November 29,2009

To Whom It May Concern,

After review and consideration of the Draft EIS for Vegetative Treatments it is the consensus of the Harney County Court to support Alternative 5 as the preferred alternative. After 23 years of losing the battle with invasive weeds because of the restrictive and inadequate availability of effective herbicides it is clear that the broadest base of herbicides should be incorporated into the EIS.

The EIS summary estimates that Alternative 5 would only increase herbicide use by 10% over Alternative 4. The summary also correctly points out that more than 90% of that increase would be in Eastern Oregon where environmental risk is lower, advantages more apparent and public acceptance of herbicide use is higher. The extremely limited use of herbicides for the past 20 years has allowed for major infestations of medusahead, knapweeds and thistles in Eastern Oregon. Alternative 5 would allow for the use of diflufenzopyr – dicamba combination for the treatment of knapweeds and thistle species. Their control is of significant importance to the overall health and sustainability of Eastern Oregon rangelands.

Developing an EIS that would exclude the potential for the treatment of the total array of noxious weeds and invasive plants on BLM lands would once again leave the BLM restricted in its management opportunities to the detriment of the public lands. The initial cost of effective, comprehensive treatment is much more practical than attempted restoration or potential loss of valuable resources. Please, do not build a notable restriction into this necessary EIS document.

The Harney County Court requests that you strongly consider Alternative 5 as the Preferred Alternative that would allow for the comprehensive management of all noxious and invasive weeds on BLM lands.

Thank you for moving forward to resolve an issue of paramount importance to the health and sustainability of BLM managed lands.

Sincerely,

Dan Nichols
Commissioner, Harney County Court

DN;sj

770

Kristopher Cahoon
<kristopher.cahoon@gmail.com>

12/01/2009 09:42 AM

To orvegtreatments@blm.gov
cc
bcc
Subject Comments on EIS re: Proposed Vegetation Treatments

To whom it may concern:

I am an avid fly fisherman that grew up here in the Northwest and as a result I have grown well acquainted with the tensions between the BLM and the many interested stakeholders that reap the varied consequences of the BLM's management practices -- it is a constant balancing act and you are bound to not please everyone. I understand that you are trying to manage the land wisely and your honest attempts to balance the diverse interests of the public are appreciated.

But the current plan to increase herbicide use on both sides of the Cascades is a management decision that will ultimately harm all the stakeholders involved in the end, regardless of the short-term gains.

The proposed plan, while partially beneficial in the short term, is extremely detrimental to the health of our land and water (and our wildlife and fish) in the long run due to the exponential effects that repeated herbicide applications will have on our ecological systems. Moreover, the health of the workers and recreators who frequent the areas chosen for the increased herbicide application will be put in jeopardy.

I realize that funding is the central issue in your management decisions. Has the BLM considered partnerships with non-profit volunteer organizations that would assist in the removal of invasive species, especially in areas frequented by recreators?

I encourage the BLM to not go forward with this proposed increase and instead institute management practices that may be more labor intensive at the outset but that will become the foundation for healthy lands in the future. I realize that this is a hard decision to make but we have to start somewhere. We can't keep reverting to the unsustainable practices that have gotten us into this mess in the first place.

Please confirm receipt of these comments.

Best regards,

Kristopher Cahoon
JD / MA Candidate, 2012
The University of Oregon School of Law

2250 Patterson St. #105
Eugene, Oregon 97405

771

"Dumas,Brett"
<BDumas@idahopower.com>

12/01/2009 09:44 AM

To "'orvegtreatments@blm.gov'" <orvegtreatments@blm.gov>
cc
bcc
Subject Comments on Veg Mgt DEIS

Attached are Idaho Power Company's comments on the "Vegetation Treatments Using Herbicides on BLM Lands in Oregon DEIS
Thank you for the opportunity to comment

Brett Dumas
Terrestrial Program Supervisor
Environmental Affairs
Idaho Power Co.
(208) 388-2330 wk
(208) 850-7721 cell

IDAHO POWER®
An IDACORP Company

November 30, 2009

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

Subject: Comments on Vegetation Treatments Using Herbicides on BLM Lands in Oregon DEIS

Dear Sir/Madam:

Idaho Power Company ("Idaho Power" or "company") appreciates the opportunity to comment on the BLM's Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement (DEIS) published in the Federal Register on October 2, 2009. Idaho Power is an integrated electric utility company based in Boise, Idaho that serves nearly 500,000 customers in a 24,000 square mile service territory in southern Idaho and eastern Oregon.

Idaho Power recognizes that managing invasive species requires cooperation among agencies, land owners and resource users using an integrated approach with a broad spectrum of treatment options. The company has a number of right-of-way authorizations for power lines on BLM lands in Oregon covering hundreds of miles. The company's Hells Canyon Hydroelectric Complex (HCC) occupies BLM lands along the Snake River in Oregon. The BLM, in its 4(e) conditions for the HCC, required certain actions relative to management of invasive species by the company. In addition, the company has over 6,000 acres of BLM grazing allotment lands along the Snake River.

The herbicides that the BLM approves for use in managing vegetation via this DEIS will affect Idaho Power's ability to effectively manage invasive weeds in cooperation with the BLM. Of the alternatives proposed in the DEIS, Idaho Power prefers alternatives 4 and 5. These alternatives include the herbicides Idaho Power currently uses to manage vegetation, particularly noxious weeds, on its fee-owned lands in Oregon and on BLM rights-of-way in Idaho. Of particular interest to the company is the opportunity to use SprayKil-26, which consists of diuron and tebuthiuron. The company has effectively used SprayKil on BLM lands in Idaho to treat vegetation around wood power line poles, which reduces the risk of wildfire burning down the poles. Both alternatives 4 and 5 would allow the use of this herbicide east of the Cascades.

Idaho Power would like to reiterate our appreciation for the opportunity to submit comments on the DEIS. We would like to thank the BLM and its staff for their efforts in this endeavor. We look forward to working with the BLM on effectively managing vegetation on lands administered by the BLM. Should you have specific questions, please feel free to contact me.

BRETT DUMAS
Terrestrial Supervisor
Environmental Affairs

208-388-2330
208-388-5880 FAX
BDumas@idahopower.com

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

Sincerely,

Brett Dumas
Environmental Supervisor

cc: Stacey Baczkowski, IPC
Sarah Tyrer, IPC
Eldon Oyadomari, IPC

772

vgholm1@verizon.net
12/01/2009 10:27 AM

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

Requestor: Vern Holm
E-mail address: vgholm1@verizon.net

Comments:
As the Coordinator of the Northwest Weed Management Partnership, I am submitting this letter in support of the Draft Vegetation Treatments Using Herbicides on BLM Lands in Oregon Environmental Impact Statement (EIS).

The Northwest Weed Management Partnership, an informal network of individuals, organizations, and agencies concerned with rural and urban invasive weed issues in northwestern Oregon and southwestern Washington.

There are a number of reasons for this supporting comment:

1) Empiric and scientific evidence show that Oregon is losing the battle against invasive weeds. In the five years of working directly with invasive weeds, I know of few landscape level success stories; rather, the opposite is true. In addition to the common invasive weeds on BLM lands (blackberry, thistle, English ivy, meadow knapweed, Scotch broom and others), new invasives such as Garlic Mustard, False Brome, False Indigo, Knotweed, Yellow Archangel and others are increasing much faster than current management methodologies allow.

2) All of the new invasive plants named above require the use of herbicide for effective control. Numerous field studies done by The Nature Conservancy, the Institute for Applied Ecology, and a wide variety of local organizations have shown that the only cost/time/resource-effective method for managing these plants is through the use of herbicide treatment.

3) With limited time and staff, it is important to have every tool available for use. The national EIS approves of 18 chemicals which have passed EPA testing for designed applications. The intelligent use of these tools leads to time and cost effective management of invasive weeds. To do any less leads to stopgap and ineffective weed control.

4) The use of a wider variety of herbicides lessens the chances that invasive plants will develop a resistance to treatment applications. In agricultural settings, land managers very seldom continue to use a single type of herbicide year after year; this is because oftentimes

sub species that are resistant to a certain herbicide will replace the ones that are susceptible. Having a wider array of herbicides available to them will allow BLM staff to avoid this potential pitfall.

5) Local and state agencies have been looking to BLM for leadership and haven't found it. As one of the largest land holders in Oregon, BLM is responsible for the health of its properties and in doing so, is in a position to be a model for smaller, less funded organizations. The lack of herbicide use and reliance on shotgun, understaffed mechanical control by BLM has weakened the resolve of other organizations (i.e., Soil and Water Conservation Districts, county governments, public works) to work harder on weed control. A typical comment is, "What good is it to get rid of Scotch broom when BLM land across the fence is full of it?" This may seem like a trivial matter, but in a state with very few weed districts and no regulation, lack of BLM leadership has hampered local organizations' willingness to incorporate invasive weed programs. This leads to a vicious circle where more invasive weeds are likely to infest BLM land.

I appreciate the opportunity to comment on the draft EIS, and will be happy to answer any questions and/or provide references regarding my submission.

Regards,

Vern Holm

Coordinator, Northwest Weed Management Partnership

3960 NE Riverside Loop

McMinnville, OR 97128

971-241-2173

vgholm1@verizon.net

773

pdxvx@yahoo.com
12/01/2009 10:30 AM

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

Requestor: Jonathan Brooks
E-mail address: pdxvx@yahoo.com

Comments:
The poisonous effect to the respiration and total physiology of the people and other animals in the \'kill zone\' of the spraying cannot be denied. Let\'s allow nature to do what nature does best and follow the lead, adapt and evolve. Management always becomes mismanagement, because of human hubris, there is no reason to support the synthetic chemical industry giants and propagate their assault on nature by supporting this plan for spraying.

774

Kathy Ging
<kathy@kathyging.com>
12/01/2009 10:47 AM

To orvegtreatments@bim.gov
cc
bcc
Subject Pls. select ALTERNATIVE 1

History: This message has been replied to.

(Pls. confirm you have received my comment, thanks!)

I have been a long time sufferer from asthma, I am also a tax payer and do not believe toxic sprays should be used in our forests. I want to urge you to select ALTERNATIVE 1 in the **Vegetation Treatments EIS - we should not be spending our dollars on putting more toxins in our fragile water, soil and airsheds.**

Thank your for not using my hard earned dollars to continue the poisoning of the forests. I was accidentally sprayed myself and experienced severe burning in my throat for several weeks. Do not subject citizens or denizens of the forest to these noxious practices.

ALL ZEE BEST IN ZEE WEST!
~~~ ~~~ ~~~ ~~~ ~~~ ~~~

Kathy Ging, M.A.,
POB 11245
Eugene, OR 97440
541-342-8461
cel 541-729-1444

Email: kathy@kathyging.com
~~~

775

kstingle@efn.org
12/01/2009 11:18 AM

To orvegtreatments@blm.gov
cc
bcc
Subject spraying Oregon's forests

It is time to put an end to the barbaric practice of spraying Oregon's forest areas with herbicides. We have long known the negative effects of these sprays on human health. (I have personally lost a few friends whose cancers were very likely caused by them, though difficult to prove.)

The only situation in which I could see using herbicides is where the spread of a difficult invasive might be halted by LIMITED on-the-ground use of herbicides, and where the goal is to get where manual methods can eradicate the plant or keep it from spreading and sprays are no longer needed.

I would like to see the entire scope of forest harvesting methods re-examined. The spread of invasives is greatly increased by our current logging methods. It is time to have a holistic approach that protects our natural environments while also producing some forest products.

NO AERIAL SPRAYING, especially near where people live!

Karen Stingle
Eugene and Deadwood, Oregon

(476)

Shelley J Jensen
<sjensen5@uoregon.edu>

12/01/2009 11:19 AM

To <orvegtreatments@blm.gov>
cc
bcc
Subject pesticides on public land

Please stop spraying. You are poisoning the nearby people.
You can do better.
Shelley Jensen
voter / taxpayer

777

kstingle@efn.org
12/01/2009 11:30 AM

To orvegtreatments@blm.gov
cc
bcc
Subject spraying Oregon's forests- PS

It is time to put an end to the barbaric practice of spraying Oregon's forest areas with herbicides. We have long known the negative effects of these sprays on human health. (I have personally lost a few friends whose cancers were very likely caused by them, though difficult to prove.)

The only situation in which I could see using herbicides is where the spread of a difficult invasive might be halted by LIMITED on-the-ground use of herbicides, and where the goal is to get where manual methods can eradicate the plant or keep it from spreading and sprays are no longer needed.

I would like to see the entire scope of forest harvesting methods re-examined. The spread of invasives is greatly increased by our current logging methods. It is time to have a holistic approach that protects our natural environments while also producing some forest products.

NO AERIAL SPRAYING, especially near where people live!

Karen Stingle
Eugene and Deadwood, Oregon

PS In case it wasn't clear from my original letter above, I favor Alternative 1.

778

Michael Wherley
<mwherley@efn.org>

12/01/2009 11:09 AM

To orvegtreatments@blm.gov
cc
bcc
Subject vegetation treatments EIS

I am strongly opposed to the increased use of an increasing number of persistent pesticides on BLM lands in Oregon. The potential effects on native plants, and aquatic and terrestrial organisms are too great to proceed with current plans.

Given that other, apparently less toxic and persistent herbicides are now available for use, the BLM should exercise its prerogative to undertake least harm management and officially prohibit the use 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,
which is another persistent groundwater contaminant known to contaminate streams and degrade slowly in aquatic systems. Just as the Forest Service Region 6 has dropped the use of 2,4-D and dicamba and is not even considering use of the very toxic diquat, diuron, bromacil, teburhiuron herbicides, so too can the BLM drop the planned use of the most toxic herbicides listed above plus picloram.

779

Jennifer Powell
<jinkyp@gmail.com>
12/01/2009 10:54 AM

To orvegtreatments@blm.gov
cc
bcc
Subject herbicide use

As a mother, Real Estate Broker and lover of the outdoors I spend a lot of time on BLM land here in Oregon. The use of herbicides is toxic to the land, the animals and the people who use it. Hunters will bring home contaminated meat. People will be drinking contaminated water. Fish will swim in contaminated creeks and rivers. Herbicide is NOT the way to go. Please do not increase your use of herbicides. Having the plants grow is the lesser of two evils. Let them be and figure out a different solution. Our environment is in extreme imbalance and the very system that sustains us all is in peril. I beg you to think about the far reaching impacts of spraying with herbicides and come to the only conclusion that will provide safety and security for this and future generations. DO NOT RELY ON MORE HERBICIDES FOR YOUR SOLUTION.

Please reply and let me know you have received this email.

Jennifer Powell
ERA All State Real Estate
123 E. Central Ave.
Sutherlin, OR 97479
541-459-6280 Office
541-255-6775 Cell

780

finnpo <finnpo@efn.org>
12/01/2009 12:02 PM

To orvegtreatments@blm.gov
cc
bcc
Subject BLM Herbicide Comment

Dear BLM,
I enjoy recreating on BLM land, and I don't want my children or myself exposed to poisons while doing so. We should have the ability to enjoy what's left of our forests without worrying about being exposed to herbicides.

And please put prevention first. Increasing the acreage sprayed and number of herbicides used without changing the BLM's forestry practices (i.e. clearcutting) that overwhelming result in invasives is a waste of tax dollars. Do we have to spend more money (that we could otherwise invest in green jobs) and repeat this horrific past?

I support Alternative # ONE only.

Sincerely,
Joel S Deese
878 Alamden St.
Eugene, OR

(781)

eatapeach.2008@yahoo.com
12/01/2009 01:27 PM

To Oregon Vegetation Treatments Draft EIS Comments <orvegtreatments@blm.gov>
cc
bcc
Subject Oregon Vegetation Treatments Draft EIS Comments - Name and address withheld

Requestor: Name and address withheld
E-mail address: eatapeach.2008@yahoo.com

I would like to opt out of the email list.

Comments:
From name and address withheld: To The BLM: Please donot spray cancer-causing chemicals on our public lands. It has been well known for 40 years that herbicides that contain 2-4-D are endocrine disruptors that cause cancer and birth defects in human beings. In addition, these herbicides also kill salmon and steelhead, as well as reptiles and amphibians. Please choose alternative 1- the NO SPRAY alternative. Control weeds manually, not with herbicides!

(782)

j rodgers
<j_rdgrs@yahoo.com>
12/01/2009 01:20 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Alternative 1, please!

Hello,

Please support Alternative 1 for the BLM management plan. The Precautionary Principle is a sane and humane way to approach issues such as this which can threaten the health and long-term viability of several species, including our own.

I am a mother of two young children, an asthma-sufferer, and hold a Master's degree in Environmental Studies. All this to say that I have many reasons--intellectual and beyond--to know the importance of your decision. I urge you to protect our public lands from being sprayed with poisons and cleared of the vegetation needed to maintain stable forest floors.

Thank you for your time and careful consideration of the matter.

Sincerely,
Jo

Jo Rodgers
2145 Garfield St.
Eugene, OR 97405

783

"Joel Durr"
<jdurr@uoregon.edu>

12/01/2009 01:32 PM

Please respond to
"Joel Durr"
<jdurr@uoregon.edu>

To orvegtreatments@blm.gov

cc

bcc

Subject Pesticide use on public lands

Greetings,
my name is Joel Durr. I am a lifelong Oregonian, and a student at the University of Oregon in Eugene.

I OPPOSE your plan to increase use of pesticides. I STRONGLY 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.

Thank you for your consideration.

- Joel Durr

784

Debbie Hebert
<d-hebert@comcast.net>
12/01/2009 01:54 PM

To orvegtreatments@blm.gov
cc
bcc
Subject BLM Vegetation Treatments EIS

Please confirm receipt of my e-mail. thank you.

*
Stop the increase use of herbicides !

I live in Eugene and enjoy the Oregon outdoors and forest. I enjoy recreating on BLM land, and I don't want my children or myself exposed to poisons while doing so. We should have the ability to enjoy what's left of our forests without worrying about being exposed to herbicides.

Put prevention first. Increasing the acreage sprayed and number of herbicides used without changing the BLM's forestry practices (i.e. clearcutting) that overwhelming result in invasives is a waste of tax dollars.

BLM lost in court years ago and mostly had its ability to apply herbicides revoked. In fact, the Eugene BLM District hasn't used any herbicides for decades as a result. Do we have to spend more money (that we could otherwise invest in green jobs) to NOT repeat the BLM's horrific past?
*
Thank you for the consideration,

Deborah Hebert
285 E 47th Ave
Eugene, OR 97405
541.285.1547
d-hebert@comcast.net

785

John Duran <jdkit@efn.org>
12/01/2009 02:05 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Spraying poisons increases Albuterol spraying

I enjoy recreating on BLM land, and I don't want to exposed myself to poisons while doing so. I have asthma that makes me more susceptible to injury from herbicides and increase the use of my Asthma spray. We should have the ability to enjoy what's left of our forests without worrying about being exposed to herbicides.

Please stop this unhealthy practice.

Please send me a confirmation you have received my message.

Food Advocate,
John Duran

786

Ruth M McKenna
<Ruth.M.Mckenna@USA.dupont.com>
12/01/2009 02:52 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Submission of Comments to the Public Record in Response to the October 2, 2009 Federal Register Notice.

Ruth McKenna
Global Registration Manager
DuPont Crop Protection
Tel. No. 302 366 5779
Fax. No. 302 366 6112

BLM Dec 2009.pdf

DuPont Crop Protection
Stine-Haskell Research Center
P.O. Box 30
Newark, DE 19714-0030

December 1, 2009

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

Subject: Draft Environmental Impact Statement prepared by the Bureau of Land Management Vegetation Treatments Using Herbicides on BLM Lands in Oregon
Submission of Comments to the Public Record in Response to the October 2, 2009 Federal Register Notice.

E.I. du Pont de Nemours and Company ("DuPont") submit the following comments on the Draft Environmental Impact Statement prepared by the Bureau of Land Management.

Chlorsulfuron
On page 314 it states eye & skin irritation are the only likely overt effects of mishandling. Chlorsulfuron technical is in EPA tox Cat. IV for skin & eye (only slight effects were seen in the studies with technical). We propose that the statement eye & skin irritation are the only likely overt effects of mishandling be deleted.

On page 150, second to last paragraph states that "Chlorsulfuron degrades in acidic soil by hydrolysis, but is relatively stable in neutral soils". To be more consistent with information provided in Table 4-14 we propose the following change: "Chlorsulfuron degrades in acidic soil by hydrolysis, but is more stable in neutral soils".

Diuron
On page 317 it states that diuron is a "suspected carcinogen, and possible endocrine disruptor". Both of these endpoints have been recently assessed by the EPA and importantly, in EPA's 2003 RED for diuron, it states, "At this time, neither the available submitted studies on diuron nor the literature show any indication of endocrine disruption effects." (http://www.epa.gov/oppsrrd1/REDs/diuron_red.pdf page 14). In the 2003 EPA RED (page 11) diuron was classified as a known/likely carcinogen. We propose that page 317 be changed to reflect US EPA's assessment.

On page 152 paragraph 3 it states that diuron is a highly persistent herbicide. To be consistent with Table 4-14 we propose this should be changed to moderately persistent.

On page 192 it states that diuron has a low to moderate tendency to bioaccumulate. The BCF in fish was determined to be between 144 and 157 to fathead minnows exposed to diuron for 24 days (Call et al, 1987). Based on this information we propose the following change: diuron has a low tendency to bioaccumulate.

Sulfometuron Methyl
On page 313, it states that EPA has not developed toxicity categories for sulfometuron methyl. However, they are provided in the EPA RED of 2008 (all endpoints are either IV or III). The EPA RED can be found at the website below.

DuPont Crop Protection
Stine-Haskell Research Center
P.O. Box 30
Newark, DE 19714-0030

http://www.epa.gov/pesticides/reregistration/sulfometuron_methyl/

On page 153 it states that sulfometuron methyl is broken down through hydrolysis and biodegradation. The half-life is short; the herbicide has a low persistence in the soil. It **moves readily though coarse textured soils** such as sand and sandy loams.

"It moves readily though coarse textured soils such as sand and sandy loams" is true for laboratory studies but field studies showed it to be immobile under field conditions. We propose the following change: delete the sentence "It moves readily though coarse textured soils such as sand and sandy loams" and amend the previous sentence to "...has a low persistence and mobility in the soil."

On page 166 it states that sulfometuron methyl degrades quickly by hydrolysis in acidic water, but is stable in neutral water. Biodegradation and **photolysis** are major loss pathways in aquatic systems, where hydrolysis rates generally are slow.

Photolysis is not a "major loss pathway..." but otherwise the statement is accurate. We propose the following change: Biodegradation is a major loss pathway in aquatic systems, where hydrolysis rates generally are slow.

We appreciate the opportunity to submit comments on the Draft Environmental Impact Statement. If you have any questions regarding this submission please do not hesitate to contact me.

Jake Vukich
Manager - Registration and Regulatory Affairs
US Business - DuPont Crop Protection

Reference

D. J. Call, L. T. Brooke, R. J. Kent , M. L. Knuth, S. H. Poirier, J. M. Huot, and A. R. Lima. Bromacil and Diuron Herbicides: Toxicity, Uptake, and Elimination in Freshwater Fish. Arch. Environ. Contam. Toxicol. 16, 607-613 (1987)"

787

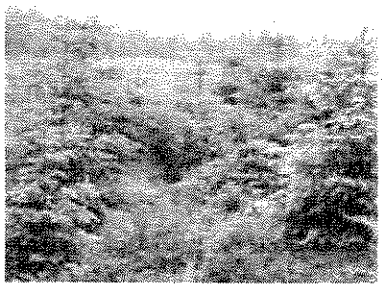
"Margo Hess"
<MargoH@rfpco.com>
12/01/2009 03:09 PM

To <orvegtreatments@blm.gov>
cc "Phil Adams" <PhilA@rfpco.com>, "Dave Cramsey" <DaveC@rfpco.com>, "Mark Wall" <MarkW@rfpco.com>
bcc
Subject DEIS Vegetation Treatments using herbicides on BLM Lands in OR comment

Please see the attached letter for comments on DEIS Vegetation Treatments using herbicides on BLM Lands in OR.

Thank you,

Margo Hess
Resource Specialist
Roseburg Forest Products Co.
PO Box 1088
Roseburg OR 97470
541-679-2734
541-679-2798 fax
margoh@rfpco.com



scan.jpg

ROSEBURG
RESOURCES CO.

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

November 23, 2009

Thank you for the opportunity to comment on the **Draft Environmental Impact Statement (DEIS) for Vegetation Treatments Using Herbicides on BLM Lands in Oregon.** Roseburg Resources Company (RRC) owns approximately 450,000 acres in Western Oregon. Many of these acres are inter-mingled with BLM lands in a checkerboard pattern across multiple BLM Districts. As an adjacent landowner we are keenly aware of the consequences your management decisions can have on our adjacent forest lands. This is especially true in regards to noxious weeds.

The BLM has correctly identified rights of way as a primary vector for the spread of noxious weeds. Control of roadside vegetation will not only greatly reduce the spread of these plants; it will provide the additional benefit of improving sight distance and subsequently the safety of its road systems. Controlling the spread of these plants will also reduce the need for neighboring landowners to use herbicides on their lands to control these invasives. This offset should be worked into your analysis. Alternative 4 (the preferred alternative) is an essential step towards the efficient and effective control of noxious species and roadside vegetation across the landscape that the BLM shares with other landowners. We fully support the BLM's efforts to address this issue.

The BLM has identified 8 "PURPOSES" that are objectives to be achieved by the proposed or other action alternatives. The DEIS states that "The selected alternative should be the one that meets the *Need* and best meets the *Purposes*." This statement clearly supports alternative 4.

Implementation of Alternative 4 across all BLM districts will be essential for successfully accomplishing the objectives. Guidance that directs each district on how best to implement these new guidelines should be issued at the state level in order to achieve success and uniform implementation at the district level.

After careful consideration, we agree with the BLM that Alternative 4 is the preferred option.

Thank you for your consideration,

Roseburg Resources Co.

Phil Adams
Manager, Oregon Land and Timber

P.O. Box 1088
Roseburg, OR 97470
PH 541.679.3311
FX 541.679.2798
www.Roseburg.com

788

David Saul
<davidmsaul@gmail.com>
12/01/2009 04:06 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Darft EIS Comments: Vegetation Treatments Using Herbicides on BLM Lands in Oregon

Attention : Edward W. Shepard,
Oregon/Washington Bureau of Land Management State Director

ALternative 1: No use of herbicides on BLM managed land is preferable to any of the other alternatives mentioned in the DEIS.

There is no reasonable justification for polluting the environment with known toxic herbicides. The DEIS recognizes that 2-4D poses a serious health threat and that should eliminate it's use in any BLM management program.

The BLM should more carefully consider addressing the root causes of the invasive and pest issues and focus on prevention rather than risky chemical attacks on the environment.

David Saul
285 East 47th Ave
Eugene Oregon 97405

789

Jonah Pugh
<vertrauen3636@gmail.com>
12/01/2009 03:43 PM
Please respond to
vertrauen3636@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,

Jonah Pugh

,

790

"Justin Asher Overdevest "
<justino@uoregon.edu>

12/01/2009 04:19 PM

Please respond to
"Justin Asher Overdevest"
<justino@uoregon.edu>

To orvegtreatments@blm.gov
cc
bcc
Subject Vegetation Treatments EIS

To Whom It May Concern:

I am writing in disapproval of the vegetation treatment of our BLM forests and land. Using more toxic chemicals to treat this areas not only puts humans and ecological environments in greater danger. More sustainable forestry rather than clearcutting would prevent the amount of invasives that are encountered on BLM land. Previous lawsuits of miscarriages in women have further demonstrated the human impact of herbicides.

If possible I would appreciate a receipt stating that you received this email. Thank you for your time.

Be well,
Justin

--
Justin Overdevest
Master's Candidate
Interdisciplinary Studies
University of Oregon

(791)

Katie Dettman
<kdettman@gmail.com>

12/01/2009 04:34 PM

To orvegtreatments@blm.gov
cc
bcc
Subject BLM Herbicide Plan Comment

Please confirm your receipt of this message. Thank you.

BLM lost in court years ago and mostly had its ability to apply herbicides revoked. In fact, the Eugene BLM District hasn't used any herbicides for decades as a result. Do we have to spend more money (that we could otherwise invest in green jobs) to NOT repeat the BLM's horrific past?

Katie Dettman
Eugene, OR

792

Jan Wroncy
<jwroncy@peak.org>
12/01/2009 04:36 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Comments on BLM DEIS Vegetation Treatments with Herbicides

Dear Sirs:

I am submitting my Draft Comments and Outline attached herein as a pdf. I will submit the Final Comments by the extended deadline of January 4, 2010.

Thank you for your consideration.

Jan Wroncy
Post Office Box 1101
Eugene, OR 97440

OutlineCommentsOnDEIS.pdf

Draft Comments/Outline on Draft Environmental Impact Statement for Vegetation Treatment Using Herbicides

Submitted by Jan Wroncy, on my own behalf and on behalf of Canaries Who Sing, Gaia Visions, Coast Range Guardians, Residents of Oregon Against Deadly Sprays and Smoke, and Citizens Environmental Protection Alliance.

Dear Sirs:

1. Comment Deadline:

There is some confusion about the extended deadline of January 4, 2010, therefore I am herein submitting a brief outline/draft today, December 1, 2009, but retain the right to submit final comments on or before January 4th next year.

2. Incorporate by Reference:

I hereby incorporate by reference, the excellent comments submitted by Doug Heiken for Oregon Wild, and Jay Lininger for Center for Biological Diversity; by the Northwest Coalition for Alternatives to Pesticides, by Lisa Arkin of Oregon Toxics Coalition; and and by Samantha Chirillo for various groups, and by Maya Gee.

I will be incorporating by reference other groups by the extended deadline of Jan. 4, 2010.

I also incorporate by reference my previous scoping comments, my previous comments to the BLM for the 17 Western States Vegetation Management Environmental Impact Statements, and my comments submitted for the older EIS for 13 Western States.

3. Opposition to Alternative 4, the BLM Preferred Alternative to use more herbicides:Support No-Herbicide Option/Restore Native Ecosystems Alternative:

I and the groups I am submitting comments for are opposed to the use of herbicides on BLM lands in Oregon for all the reasons stated in the above referenced comments. We are therefore opposed to the BLM Preferred Alternative, No. 4.

4. False premise used to justify toxic chemicals: Invasion Biology

See: INVASION BIOLOGY: Critique of a Pseudoscience by David I. Theodoropoulos, 2003.

In addition, I would like to point out that herbicides always do more damage to native plants than to "noxious weeds" or invasive species. Therefore continual, large scale use of these toxic chemical herbicides will alway select for stronger weeds, thus leaving nothing alive that can compete with the weeds, and therefore never be able to eliminate weeds. Since the chemical herbicides are very persistent, and in fact last much longer than the BLM would care to admit, they will sterilize the soil for long periods of time, thus additionally disfavoring natural, native vegetation communities. Using toxic chemical herbicides not only contaminates the environment, but also poisons whole ecosystems.

5. "Inert" and Secret "undisclosed" ingredients in pesticides and pesticide adjuvants:

If the BLM does not reveal all the "inert" other ingredients in the formulations proposed for use, and all the ingredients of adjuvants added to tank mixes or batches, the BLM will not comply with NEPA by providing pertinent information for decision makers to review, and therefore also for the public to review. The public is rightfully reluctant to approve plans full of "secrets", especially toxic chemicals that we are being asked to accept exposure to.

See: Unidentified Inerts by Caroline Cox, 2006
See also: http://www.pesticide.org/inertspetition2006.pdf
See: **EPA Seeks to Disclose Hazardous Pesticide Inert Ingredients**
at: http://www.epa.gov/opprd001/inerts/

6. Toxic active ingredients, and adjuvants: Need to identify exact formulas and analyze impacts of formulas and tank mixes
See: PORPHYRIC PESTICIDES: Chemistry, Toxicology, and Pharmaceutical Applications , Edited by Stephen O. Duke and Constantin A. Rebeiz, an American Chemical Society Symposium Series 559, 1994.
See also "Suicide Inhibitors" in: RATIONAL APPROACHES TO STRUCTURE, ACTIVITY, AND ECOTOXICOLOGY OF AGRICHEMICALS, edited by Wilfried Draber and Toshio Fujita, 1992.
See: MECHANISMS OF CHEMICAL-INDUCED PORPHYRINOPATHIES, Edited by Ellen K. Silbergeld and Bruce A Fowler, 1987.
See: THE COLOURS OF LIFE: An Introduction to the Chemistry of Porphyrins and Related Compounds by Lionel R. Milgrom, 1997.
See: RISKY BUSINESS: Genetic Testing and Exclusionary Practices in the Hazardous Workplace by Elaine Draper, 1991.

7. Failure to comply with NEPA: Uninformed decision-makers, cumulative impacts, etc.

8. Failure to comply with FIFRA: Mislabeled, false claims of safety, Label violations

9. Violations of: 7 USCA Section 136j Unlawful acts [FIFRA section 12]: unlawful testing on humans.

10. Failure to comply with the CWA: NPDES Permits

11. Discrimination against disabled people/Disparate Harm to disabled people/Denial of Access:

12. Violations of Human Rights:

See: Documents by Dr. Tom Kerns regarding herbicides, insecticides, and human rights, etc.

13. Violations of Native Americans rights: traditional medicines, wild crafting, native habitat, traditional and new food sources.

14. Arbitrary and capricious labeling of plants as weeds, undesirable vegetation, noxious plants, and invasive species/Denial of beneficial and medicinal uses:
See: Comments by Maya Gee

15. Violations of the Endangered Species Act/Unnecessary threats to Endangered Species: Salmon, owls, etc.

16. Failure to correct past land management practices that substantially cause the vegetation problems:
See: **SACRED COWS AT THE PUBLIC TROUGH** by Denzel and Nancy Ferguson, 1983.

The BLM proposal utterly fails to put prevention first. The BLM proposal for massive spraying of herbicides on 100's of thousands of acres in Oregon will result in massive devastation to the public lands, and massive poisoning of the public.

Respectfully submitted by

Jan Wroncy, on my own behalf and on behalf of
Canaries Who Sing,
Gaia Visions,
Coast Range Guardians,
and Citizens Environmental Protection Alliance
Post Office Box 1101
Eugene, OR 97440

793

"Brian Kelly"
<brian@hellscanyon.org>
12/01/2009 04:37 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject DEIS Comments

Attached you will find our comments regarding the Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement.

Thank you for the opportunity to provide comments!

Brian Kelly
Restoration Coordinator
Hells Canyon Preservation Council
Post Office Box 2768
La Grande, OR 97850
541-963-3950 extension 24
www.hellscanyon.org

BLM DEIS comments.doc

Hells Canyon Preservation Council
PO Box 2768
La Grande, OR 97850
541-963-3950

Bureau of Land Management
Vegetation Treatment EIS Team
PO Box 2965
Portland, OR 97208-2965

Sent via email to: orvegtreatments@blm.gov

December 1, 2009

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

To the Bureau of Land Management:

Thank you for addressing this important topic. Invasive plants are a significant problem on our public lands. They affect the native plant communities of our grasslands and forests and they reduce the quality of habitat for wildlife and fish.

We support an ecologically-responsible approach to invasive plant management designed to protect native ecosystems, fish and wildlife habitat, and human health concerns.

We also support that in this DEIS the BLM "does not propose the use of herbicide specifically for commodity production such as projects to improve timber growth or livestock forage".

We recognize that herbicides are one component of an integrated approach to control of invasive weeds at this point in time. However, we strongly believe that the BLM should make a specific measurable commitment to reducing reliance on herbicides over time.

Prevention

We would like to strongly emphasize the role of prevention in attaining these goals. The best defense against invasive plants is a healthy native plant community. Intact native plant communities are the most resistant to invasion by weeds. Undisturbed soil crusts also protect soils from invasive plant colonization. These crusts are damaged by disturbance. Disturbance of soils and plant communities gives weeds the opportunity to spread and so it is essential to protect our public lands from future disturbance.

Dispersal of existing weeds is another aspect of the problem that must be addressed by prevention measures. Motorized vehicles, livestock grazing, and timber management operations are known to cause the spread of invasive plants across the landscape. This has been documented in scientific literature.

It is very important that weed prevention and treatment activities are effectively incorporated into individual projects and carried out under the regulation and guidance of every BLM program.

We feel that prevention is the most important component in the control of invasive plants and that the DEIS should emphasize and expand upon specific measurable management to prevent invasive weeds from entering and spreading on BLM lands. These prevention measures should also be monitored to assess their effectiveness.

Education
Education is an important element of invasive weed prevention. BLM visitors should be educated about the problem and what must be done to prevent the spread of invasive plants.

Integrated Approach
We recognize that herbicides are one component of an integrated approach to control of invasive weeds at this point in time. However, we encourage the continuation of biological control and manual / cultural treatments in situations where these non-chemical approaches are likely to be effective. Herbicide spraying alone will not solve the problem and in some cases, herbicides create new weed problems. Additionally, we are concerned about potential effects of herbicides upon human health, fish and wildlife, and non-target native plants. Other concerns are the potential cumulative effects of herbicides over time, as well as potential unknown effects from combinations of different chemicals and adjuvants.

The BLM should make a specific measurable commitment to reducing reliance on herbicides over time.

Restoration
The restoration of treated sites is an essential part of invasive weed control. Native plant species that belong to the local plant community should be used to re-occupy the site and reduce the risk of re-infestation by invasive weeds. Seed and other plant propagation materials should be native and collected as locally as possible. Species diversity is beneficial and native forbs as well as native grasses should be included.

Specific comments

- We ask that the BLM directly address specific measures to <u>prevent</u> invasive weeds on BLM lands and describe how the measures will be implemented.
- We request that the BLM incorporate weed prevention, treatment and monitoring into all BLM program activities. Program activities such as logging, grazing and motorized vehicle use should be modified in order to prevent the spread of invasive weeds and to prevent conditions favorable to their establishment.
- Given that certain BLM projects are treated as categorical exclusions and not analyzed under environmental impact statements, we therefore ask that the DEIS address invasive plant concerns for categorical exclusion projects. Management activities proposed as categorical exclusion projects should be assessed in light of their effects upon invasive plant prevention.

- The authority to apply herbicide aerially as described in the DEIS is excessively broad. Aerial application of herbicides should be subject to NEPA analysis on a project-by-project basis.
- Livestock grazing, logging, and off-road vehicle use should not be allowed near known populations of invasive plants to prevent weed-dispersal from these activities.
- We support the emphasis on inventorying, monitoring and early treatment as described in the 'Early Detection Rapid Response' (EDRR) approach. We encourage the BLM to utilize the EDRR approach as a means to reduce the use of herbicide over time as well as preventing the spread of invasive plants.
- Effective cultural / mechanical and biological treatments should be considered in all situations and utilized when they are likely to be as effective as chemical treatment.
- Herbicide should not be sprayed in amphibian habitat.
- Herbicide should not be broadcast sprayed in riparian areas.
- Invasive weed concerns should be a priority during transportation planning on BLM lands. All motorized travel should be limited to designated routes, cross-country motorized use should be prohibited, and all unnecessary roads should be closed.
- Opportunities should be explored to provide washing stations to prevent the spread of weeds by vehicles.
- We ask that the BLM takes a proactive role in having a forb component in native seed mixtures to accurately reflect the plant communities on BLM lands.
- Education should be a key component to weed prevention and we ask that the DEIS make specific plans for outreach for public participation in weed prevention and eradication efforts.
- We believe that the BLM should require that all feed for horses and livestock is certified as "weed free" throughout all BLM lands.

In closing, the best defense against invasive plants is a healthy native plant community. Prevention of site disturbance and prevention of the dispersal of weeds is paramount. We encourage the responsible management and stewardship of the BLM lands in order to prevent the spread of invasive weeds.

We appreciate your considerable efforts toward the preparation of this vegetation treatment DEIS. Thank you for the opportunity to comment on this proposal and for your attention to the importance of invasive weeds and native plant communities.

Sincerely,

Brian Kelly
Restoration Coordinator
Hells Canyon Preservation Council

794

Diane <iriedi@yahoo.com>
12/01/2009 04:48 PM

To orvegtreatments@blm.gov
cc
bcc
Subject herbicide proposal comments

Dear BLM folks;

Please please do not increase the number of herbicides used in the BLM forests. In fact, please stop using any herbicides at all!

I live within a quarter mile of BLM land here in the Mohawk Valley. I have lived here since the seventies. I was pregnant during the height of herbicide spraying in the mid seventies. I have a daughter with birth defects that were caused by those herbicides.

My grandsons and I recreate on BLM lands both near my home and up Shotgun Creek. We walk in the forests. We play in the creeks. We pick huckleberries and elderberries. How are we to know where and when it is safe to do these things?

In my experience, the wind often blows, carrying with it whatever is in the air. The streams run downhill, carrying in them whatever settles upstream. There is no way to prevent contamination from herbicides.

It is also my experience that most invasive plant species are brought in on log trucks and other vehicles, and that the invasive species thrive in clearcuts. Changing your forestry practices would help a lot to prevent this invasion. And if you must get rid of these plants, you could be putting a lot of folks to work to do it manually. And we do need jobs out here in the Mohawk Valley, especially for young folks.

While I am opposed to the use of herbicides, I support Alternative One as the best alternative you offer.

Thank you,

Diane Albino
Board Member, Mohawk Watershed Partnership
Board Member, McKenzie Watershed Council
Resident of Mohawk Valley for 40 years
Native Oregonian
Mill Worker's Daughter

795

same as 766

Fred Otley
<fredotley@hotmail.com>
12/01/2009 04:56 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject FW: Comments on Vegetation Treatment DEIS

To: Vegetation Treatment DEIS Team

The attached is the Diamond Weed Management Area Groups comments on the DEIS. This is the second time we have sent it to you. Thank you very much

Tim O'Crowley, Chairman

From: fredotley@hotmail.com
To: orvegtreatments@blm.gov
CC: ocrowleys@hughes.net
Subject: Comments on Vegetation Treatment DEIS
Date: Tue, 1 Dec 2009 03:50:00 +0000

Diamond Weed Management Area.doc

Date: December 1, 2009

To: Vegetation Treatment EIS Team
Att. Edwward W. Shephard
BLM State Director
P.O. Box 2165
Portland, OR 97208-2965

From: Diamond Valley Weed Management Area
Tim O'Crowley, Acting Chairman
49030 Clemens Ranch Road
Diamond, Oregon 97722
(541) 493-1164

Subject: Comments concerning Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement.

The importance of the above DEIS cannot be overstated. Being able to use all available herbicides that effectively control or manage medusa head and other weed species is vital to ecological, economic, watershed, wildlife, wild horses, livestock grazing, public use, recreation and other important resources. The existing situation of uncontrolled medusa head spread on BLM lands is increasing at an exponential rate as is the resultant damage to environmental conditions.

It is vital to our area and ongoing control efforts by our groups to give BLM the use of proven management practice and herbicides. BLM lands are intermixed with private lands and cooperative management efforts by BLM and private landowners is very important and dependent upon specified herbicides described in the draft EIS.

The proposed action is important to sage grouse dependent sagebrush habitat and riparian areas. Medusa head is rapidly invading and dominating sagebrush habitats in healthy well managed plant communities, permanently damaging and destroying these important habitats. Medusa head competes with forbs, other shrub and grass species negatively impacting and in many cases totally dominating these communities.

The risk to many habitats are large and critical to our cooperative efforts on private lands. Private landowners are monitoring and cooperating with BLM on controlling medusa head on private lands and prevent the spread to adjacent and intermixed BLM lands. The use of herbicides such as Plateau is a proven management tool and is vital to our efforts and vital to use on BLM lands.

Medusa head creates an annual risk of wild fire due to the chemical and physical properties of this high priority noxious weed. This annual grass has flash fuel properties that put important habitats at risk. Cooperative landscape ecological and watershed management projects are also at risk due to medusa head spreading on BLM lands.

Wildlife habitats of many different types are at risk if BLM and private landowners are not successful in medusa head control efforts. Wild horses will be negatively impacted as will livestock grazing with dramatic economic and ecological costs.

In summary all of the proposed herbicide uses described into the DEIS an important management tools to protect BLM and public lands. We are in support of the proposed action in the DEIS because federal, county, state and private parties throughout Oregon are working together to organize cooperative management programs and integrated efforts to protect public and private lands.

The undersigned private individuals are members of Diamond Weed Management Area and are in support of DEIS.

Tim O'Crowley
Susan O'Crowley
Seth O'Crowley
Earl Carson
Shirley Carson
Dan Otley
Katie Otley
Larry Otley
Sue Otley
Dave Thompson
Bill Otley
Dick Jenkins
Marvin Jess
Rod Otley
Debbie Otley
Rich Jenkins
Don Davis
Larry Dunn
Brian Dunn
Todd Carson
Annette Carson
Fred Otley
Debbi Otley
Harold Otley
Mary Otley
Mike Largent
Dan Nichols

(796)

"Mary Camp"
<mary@campforest.com>
12/01/2009 05:33 PM

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

To: Vegetation Treatments EIS Team, Bureau of Land Management, Oregon State Office

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

Date: December 1, 2009

Regarding: Public comments on Vegetation Treatments Using Herbicides on BLM Lands in Oregon DEIS

We will submit additional comments by January 4th, in light of Todd Thompson and Ken Denton' s confirmation that, *"BLM will be accepting and fully considering all public comments received on the Vegetation Treatments Using Herbicides on BLM Lands in Oregon Draft Environmental Impact Statement through January 4th, 2010."*

Deer Creek Valley Natural Resources Conservation Association is an all volunteer community organization located in Selma, Oregon committed to its mission: *"To promote and protect environments and species that sustain the web of life and human communities. "*

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

BLM Vegetation Treatments EIS Team failed to consider and address the following:

Scoping Comments on Vegetation Treatments Using Herbicides on BLM Lands in Oregon EIS Submitted by Mary Camp for Deer Creek Valley Natural Resources Conservation Association July 28, 2008:

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

The Natural Selection Alternative (NSA) is a "reasonable" alternative under NEPA and should

be analyzed by the BLM managers as an integrated strategy to manage invasive weeds and fire fuel density on public land. Preventative and passive vegetation management as prescribed in the NSA are proactive treatments for controlling invasive species, restoring native vegetation, and reducing fire fuel density on public land. The BLM agrees that prevention is the best approach for managing invasive plants and passive restoration is a valid technique for vegetation management. BLM cannot avoid analyzing these techniques simply because they do not meet a traditional definition of vegetation "treatments:" "Passive treatments, by inherent definition, are not considered to be treatments that manipulate vegetation..."

The Natural Selection Alternative retains naturally evolved species and conditions that resist the invasion of non-native species. The BLM should implement the Natural Selection Alternative to meet legal, social and environmental requirements for public lands. We request that the NSA (as presented for BLM's South Deer Landscape Management Project, Medford District, BLM) be fully and equally assessed as an alternative in the EIS.

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

We incorporate by reference, the July 25, 2008 scoping comments on the Vegetation Treatments EIS for Oregon BLM written by Norma Grier, Northwest Coalition for Alternatives to Pesticides; Lisa Arkin, Executive Director, Oregon Toxics Alliance/Members of the Oregon Pesticide Action Workgroup; and Samantha Chirillo. We also incorporate by reference the Natural Selection Alternative for the South Deer Landscape Management Project, Medford District BLM, Jan 2005 and all appendices, attachments and references; and 8/6/05 EA comments for the South Deer Landscape Management Project (EA# OR110-05-10) by Dennis Odion, PH.D. Vegetation Ecologist.

Sincerely,
Mary Camp, President
Deer Creek Valley Natural Resources Conservation Association (Deer Creek Association; DCA)
P.O. Box 670, Selma, OR 97538
maryc@rogueriver.net
This document was submitted on line (
(http://www.blm.gov/or/plans/vegtreatmentseis/comments.php)
http://www.blm.gov/or/plans/vegtreatmentseis/comments.php) On July 28, 2008, 2 PM

Name: Mary Camp for Deer Creek Association
Email: maryc@rogueriver.net

797

Fred Otley
<fredotley@hotmail.com>
12/01/2009 05:56 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject RE: Response to Vegetation Treatment DEIS

To: Vegetation Treatment EIS Team:
Att. Edward W. Shephard
BLM State Director
P.IO. Box 2165
Portland, OR 97208-2965

To Whom It May Concern:

I strongly support the DEIS Vegetation Treatments Using Herbicides on BLM Lands in Oregon. I have worked on cooperative weed programs since 1978. They were successful when herbicides were legal on public lands because all small infestations could be successfully eradicated, monitored and revisited during following years. The State of Oregon "A, B and C Priority Lists" were a valuable tool and very successful on private, State and Federal lands.

The groups that successfully litigated and restricted all herbicide use on the majority of Federal lands have done more environmental damage than any other polluting entity in the history of this country. We now have tens of millions of acres of medusa head, yellow star thistle, leafy spurge, four extremely damaging Knapweeds and a number of critical other species. If Federal agencies could have sprayed outlying infestations many of these infestations could have been limited to specific geographic areas instead of exponental spread through many wonderful and important wildlife, environmental and agricultural areas.

The DEIS appears to make the most important herbicides available to one again strategically and cooperatively develop management integrated systems to protect native landscapes and geographical areas not infested with the worst of the worst high priority and damaging noxious weeds. It is vital that all of the listed herbicides be available for small and large new infestations into new geographical areas and cooperative boundary management protection areas which help limit the movement of large infestations. All of the herbicides should be available for along all roads and trails in all areas including special designations and wilderness for prescribed 30 and 100 road widths. This will give minimum tool strategies a chance to work in outlying areas.

I have watched medusa head start from two acres in 1980 on BLM grow to at least 30,000 acres in 2009. Medusa head was competely controlled/eradicated on all private land until 1990 when they finally gave up due to hundreds of acres of small infestations on public land that could not be legally treated. Several small infestations approximately twenty miles from the original two acres have shown up near our ranch borders. Again all of the small infestations on private land are being treated. BLM despertly need to treat their small patches which would help protect thousands of acres of wildlife habitat, watershed and wilderness.

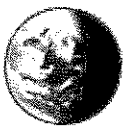
I implore you to not get side railed by well meaning but uninformed folks that think nature can take care of this issue by itself. Until effective biological controls are found we must have herbicide management tools to strategically protect clean landscapes and habitats.

High priority noxious weeds can easily devalue property by fifty percent and completely destroy critical wildlfie habitats including species such as sage grouse.

Sincerely,
Fred I. Otley, Vice-President
40926 S Diamond Ln
Diamond, OR 97722
(541) 493-2702

---

(798)



"Orville Camp"
<orville@campforest.com>
12/01/2009 06:29 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject Comments on Vegetation Treatments Draft Environmental Impact Statement

Camp Forest
2100 Thompson Creek Road
Selma, OR 97538

December 1, 2009

RE: Comments on BLM Vegetation Treatments Using Herbicides in Oregon DEIS

Dear DEIS Team:

We have more than 40 years of experience in sustainable forest practices. We find no credible evidence to suggest that poisoning species will result in more long term benefits than adverse effects. We oppose use of toxic chemicals in forests.

The number one cause of forest ecosystem community failures is human management. Killing species with toxic chemicals causes huge collateral damages. Poisoning species adversely affects the ecosystem community that sustains trees and humans?

Natural forest ecosystem communities, like the human body, depends on their parts to sustain the whole, and the whole to sustain their parts. Killing human body parts is killing the whole body, and using poisons to kill ecosystem community parts is killing the whole body. BLM managers are not retaining ecosystem community species that sustain them.

You can't rely on the same kind of management thinking that got you into this mess to also get you out of it. Applying different poisons to problems you managed to create is not a solution. Applying different thinking could be a sustainable solution.

At Camp Forest we retain the natural ecosystem community of species around trees that sustain trees. We probably grow more trees for wood per acre on a sustainable basis than any forestry tree management practice. The reason is simple. We retain the parts that sustain the whole ecosystem community, including trees. We don't use poisonous chemicals, have no need for them, and we have hugely less management costs than the people who do.

Killing the parts that sustain the whole forest ecosystem anywhere, is killing them everywhere. Our rights to have sustainable forest practices are being denied by the people who poison those parts. BLM must start thinking in terms of retaining the parts that sustain whole ecosystem communities, which includes humans.

Sincerely,
Orville and Mary Camp

(799) Same as 797

Fred Otley
<fredotley@hotmail.com>
12/01/2009 06:48 PM

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

To whom it may concern:

The attached comments were sent December 1, 2009 and not December 2. My computer date has a wrong date setting. Thank you very much.

Sincerely,
Fred I. Otley

 Fred Dec2009VegTreatDEIS.doc

December 1, 2009

To: Vegetation Treatment EIS Team:
Att. Edward W. Shephard
BLM State Director
P.O. Box 2165
Portland, OR 97208-2965

To Whom It May Concern:

I strongly support the DEIS Vegetation Treatments Using Herbicides on BLM Lands in Oregon. I have worked on cooperative weed programs since 1978. They were successful when herbicides were legal on public lands because all small infestations could be successfully eradicated, monitored and revisited during following years. The State of Oregon "A, B and C Priority Lists" were a valuable tool and very successful on private, State and Federal lands.

The groups that successfully litigated and restricted all herbicide use on the majority of Federal lands have done more environmental damage than any other polluting entity in the history of this country. We now have tens of millions of acres of medusa head, yellow star thistle, leafy spurge, four extremely damaging Knapweeds and a number of critical other species. If Federal agencies could have sprayed outlying infestations many of these infestations could have been limited to specific geographic areas instead of exponential spread through many wonderful and important wildlife, environmental and agricultural areas.

The DEIS appears to make the most important herbicides available to one again strategically and cooperatively develop management integrated systems to protect native landscapes and geographical areas not infested with the worst of the worst high priority and damaging noxious weeds. It is vital that all of the listed herbicides be available for small and large new infestations into new geographical areas and cooperative boundary management protection areas which help limit the movement of large infestations. All of the herbicides should be available for along all roads and trails in all areas including special designations and wilderness for prescribed 30 and 100 road widths. This will give minimum tool strategies a chance to work in outlying areas.

I have watched medusa head start from two acres in 1980 on BLM land grow to at least 30,000 acres in 2009. Medusa head was completely controlled/eradicated on all private land until 1990 when they finally gave up due to hundreds of acres of small infestations on public land that could not be legally treated. Several small infestations approximately twenty miles from the original two acres have shown up near our ranch borders. Again all of the small infestations on private land are being treated. BLM desperately need to treat their small patches which would help protect thousands of acres of wildlife habitat, watershed and wilderness.

I implore you to not get side railed by well meaning but uninformed folks that think nature can take care of this issue by itself. Until effective biological controls are found we must have herbicide management tools to strategically protect clean landscapes and habitats.
High priority noxious weeds can easily devalue property by fifty percent and completely destroy critical wildlife habitats including species such as sage grouse.

Sincerely,
Fred I. Otley, Vice-President
Otley Brothers Inc.
40926 S Diamond Ln
Diamond, OR 97722
(541) 493-2702

800

Melanie Rios
<melanierios1@gmail.com>

12/01/2009 07:13 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject alternative plans for pesticide use on BLM land.

History: This message has been replied to.

Dear Bureau of Land Management,

Please adopt alternative number one, which is to not use herbicides on BLM land. My friends live near to those lands, and they and their families have suffered from higher rates of cancer. Herbicides poison the air, the soil and the water, all resources upon which human life depends. Please let me know that you have received this request.

Sincerely,

Melanie Rios
882 Almaden Street
Eugene, OR 97402

801

"Ruth"
<ruthduemler@comcast.net>
12/01/2009 08:41 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject herbicide use

The following comment is for the BLM Vegetation Treatments EIS:

I've ben a wilderness lover and wanderer in California and now for almost 20 years in Oregon. Since moving here I've been concerned with the spraying of herbicides and other poisons. It was not long after my daughter's yard was sprayed with a herbicide that she came down with non-Hodkins lymphoma, a large tumor surrounding her heart. After years of treatment and chemo she has now been in remission for almost thirteen years. Since then I have read of the dangers and the link of herbicides and cancer. One research project was done for Canadian farmers coming down with cancer after using a herbicide. It is now predicted that one in every three men will have cancer and one in every four women. A precautionary step should be taken to stop all chemical pollution including herbicides.

Sincerely yours, Ruth Duemler 484-6145
1745 Fircrest Dr. Eugene 97403

802

marcia rodine
<marciarodine @yahoo.com>
12/01/2009 08:43 PM
Please respond to
marciarodine@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,

marcia rodine

803

Hannah Torres
<hannahshomes@gmail.com>
12/01/2009 09:23 PM

To orvegtreatments@blm.gov
cc
bcc
Subject Topic: Public Comment on Draft Environmental Impact Statement on BLM Vegetation Treatments Using Herbicides in Oregon

Topic: Public Comment on Draft Environmental Impact Statement on BLM Vegetation Treatments Using Herbicides in Oregon

Because the herbicides proposed for use are highly toxic to native, non-target plants, including rare plants, federally listed plants, medicinal, and edible plants, and may limit the abundance of and contaminate edible mushrooms; several pose serious human health risks (eg. cancer, reproductive impairment, endocrine disruption, liver failure) to recreationaists, forest workers, Native American subsistence gatherers, mushroom pickers, etc.

Several of the herbicides proposed for use are known ground-water contaminants, some have high likelihood of damaging food or ornamental crops if aerially sprayed (aerial spraying is planned), some are toxic to fish, and some pose higher risks to wildlife - especially bees, birds, amphibians, and grazing mammals such as deer elk, pronghorn, and wild horses, as well as to small mammals and scavengers. Using a large number of herbicides, while touted as more effective for controlling invasive plants and often cheaper than using manual control methods, still means that in most cases they are redundant with each other for use on particular invasive plants, making most of them unnecessary.

Please DO NOT USE THESE DANGEROUS HERBICIDES on public Land. I urge you to choose the first alternative, no herbicides. Many of my friends rely on the edible forest plants and mushrooms for their well being.

Hannah Torres
hannahchristinagrace@gmail.com

804

"linda lou"
<frohbach@pacinfo.com>

12/01/2009 09:38 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject BLM herbicide spraying

History: This message has been replied to.

December 1, 2009

To whom it concerns:

I am writing to register my dismay with the proposed increase of herbicide spraying on BLM lands. I am a taxpayer, a college graduate, a resident of Oregon for the past 39 years and the mother of 4 grown children and 1 grandchild who all make their homes here in Oregon. The only alternative I support is ALTERNATIVE #1 - to NOT use herbicides. They are poison and our environment is already too toxic. We should make jobs for more people and develop a plan to use mechanical and manual methods of control.
I hope you will take my comment seriously, and please notify me that you received this input via e-mail.
Thank you for your time and attention.

Sincerely,
Linda Frohbach
PO Box 11489
Eugene, OR 97440

805

<zentnerdj@msn.com>
12/01/2009 10:01 PM

To <orvegtreatments@blm.gov>
cc
bcc
Subject public comments on vegetation treatments using herbicides on BLM Lands in Oregon

Vegetation Treatments EIS Team,

Please receive my public comments submitted in the attached .pdf file.

Thank You.

Duane Zentner
4055 Kildare Street
Eugene, OR 97404

ph: (541) 461-0381

email: zentnerdj@msn.com

Duane Zentner PUBLIC COMMENTS on Vegetation Treatments.pdf

PUBLIC COMMENTS

RE: Vegetation Treatments Using Herbicides on BLM Lands in Oregon

Submitted: 12/1/09

By: Duane Zentner

To: Vegetation Treatments EIS Team

I am an industrial timberlands forester with 30 years experience working in Western Oregon forests. I would like to comment on the Draft Environmental Impact Statement to use herbicides in Oregon.

I support the efforts of the BLM to progressively use all the tools available to protect our precious resources. I believe that Alternative 5 is the best approach to this end. Alternative 5 has a futuristic approach that gives the BLM the added flexibility of using additional herbicides and the use of helicopters in Western Oregon.

In many cases, helicopters are actually more of a necessity in Western Oregon because of the predominately steep terrain. Treating weeds by ground only on this steep terrain presents both safety issues for individual ground applicators and unnecessary higher costs. Western Oregon has many remote areas away from people, population centers and water, and the risk to humans or any resource is low to negligible. These areas would qualify for treatment by helicopter and their use should be considered on a case by case basis.

Helicopter application technology has advanced in the past few years allowing applications to be done with safety and precision. The use of shape files with a Satloc® navigation system and half boom applications along streams and property lines are several recent and well-used techniques. A national Spray Drift Task Team has concluded that "with good drift management practices, drift can be practically reduced to zero."

Because helicopters can be more productive, more effective treatments will be realized when small "windows" of treatment opportunities exist due to weather, weed development, or other factors. Effective weed treatments will therefore reduce the need for re-treatments and reduce the overall use of herbicides. For most herbicides, including 2,4,D, potential exposure to applicators is less when applied by helicopter.

The proposal to limit helicopters to Eastern Oregon in Alternative 4 is therefore without merit and needlessly self limiting. In my experience, a combination of helicopter and ground treatments can and should be used. Alternative 5 best fulfills the 8 stated general purposes for considering an action, especially purposes 6, 7 and 8.

The ODA and BLM routinely find new species of invasive weeds every year. Because Alternative 5 allows for the use of additional herbicides, more tools are available for new and unforeseen invasive weeds. The additional herbicides listed in Alternative 5 have already been identified for limited and judicial use, falling within the spirit of what is socially acceptable.

I would like to commend the BLM in recognizing the negative impact that in-action and non-herbicide use by the BLM is having on adjacent private lands. On a daily basis, I witness areas on private land where invasive weeds have been controlled by a private owner, only to later see re-invasion by wind-blown seed or mechanical means from the adjacent untreated BLM land. A good example of this is when a road grader spreads scotchbroom seed from the untreated BLM land onto adjacent private land. The checkerboard ownership of BLM lands contributes directly to this problem. A more recent example is the spread of knotweed from BLM lands onto private lands by water via a creek. Weeds know no borders.

Under Alternative 2, a No Action Alternative, noxious weeds would infest 5.9 million acres or 1/3 of the BLM land base in Oregon in the next 15 years. I believe this is socially unacceptable. Under Alternative 5, for a small incremental use of herbicides, 2.2 million less acres will be infested by invasive and noxious weeds than with the No Action Alternative 2. Keep in mind that for Alternative 5, where the highest use of herbicides is allowed, less than 1% of the land base will be treated.

If Alternative 5 is implemented, recreational opportunities, ecosystems, and fish and wildlife habitat will be essentially maintained. I believe that the majority of the public accepts that the careful use of herbicides as proposed in Alternative 5 will best meet these fruitful and worthy conditions and is the most socially acceptable alternative.

Alternative 5 makes more tools available to the BLM for the purpose of controlling a public menace and maintaining our ecosystems. The BLM has done its homework and has given much thought to this process. I welcome and encourage the BLM to take prudent and responsible action.

Sincerely,

Duane Zentner

Duane Zentner
4055 Kildare Street
Eugene, OR 97404

Ph: (541) 461-0381

Email: zentnerdj@msn.com

806

Francis Eatherington
<francis@umpquawild .org>
Sent by: FRANCIS EATHERINGTON
<featherington@wildblue.net>

12/01/2009 10:56 PM

To orvegtreatments@blm.gov

cc Josh Laughlin <jlaughlin@cascwild.org>, Lesley Adams <lesley@kswild.org>, Jay Lininger <jlininger@biologicaldiversity.org>

bcc

Subject Vegetation Treatment DEIS comments

History: This message has been replied to.

December 1, 2009

BLM,

Attached are comments from Umpqua Watersheds, Cascadia Wildlands, Klamath Siskiyou Wildlands Center and the Center for Biological Diversity, on the Vegetation Treatments Using Herbicides on BLM Lands in Oregon DEIS.

Please confirm that you have received these comments.

Francis Eatherington
541-643-1309

DEIS Cmts on Oregon herbicides.doc

December 1, 2009

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

Emailed to orvegtreatments@blm.gov

Dear BLM

Please consider these comments from Umpqua Watersheds, Cascadia Wildlands, Klamath Siskiyou Wildlands Center and the Center for Biological Diversity, on the Vegetation Treatments Using Herbicides on BLM Lands in Oregon DEIS. Please choose the Alternative 1 – no herbicide use, to give you an opportunity to develop an alternative that greatly reduces the amount of herbicides used below that of alternative 3.

We acknowledge that some herbicides are occasionally needed to address the immense problem of non-native, invasive plant species in Oregon. However, Alternatives 2 through 5 also target native plants, reduce much needed manual-labor jobs, depend too much on fossil-fuels, depends too little on prevention, and increases poisons in our environment when other options should have been considered.

The preferred alternative of this project proposes to:

* increase herbicide use on public BLM lands in Oregon, from 17,000 acres annually, to 45,000 acres, of which 15,000 acres is killing Oregon's native vegetation[1], while the remainder, 30,000 is to kill invasive plants;
* address the court's 1984 injunction against BLM using herbicides in Oregon, except for four herbicides[2] currently used. The court determined that the BLM had not addressed the cumulative human health effects of other herbicides;[3]
* aerial spray herbicides east and west of the Cascades
* spray herbicides along roads and developed areas to control native vegetation;
* spray western juniper in shrub/grass communities in lieu of wildfire reintroduction;
* kill tan oak in Southern Oregon before SOD can kill it;
* make 12 herbicides available to BLM to use west of the Cascades, and 16 herbicides east of the cascades;
* use herbicides still under study by the EPA and NMFS before conclusions on their safety;

While we agree that invasive, non-native plants are a large problem, our comments question if other options are available, such as a vigorous prevention program, or using more manual labor.

---

[1] DEIS page 291
[2] 2,4-D; dicamba; glyphosate; and, picloram for noxious weed control only.
[3] DEIS page 1

1. Herbicide studies are incomplete

Studies are not complete on how herbicides affect classes of people, such as the elderly, or pregnant women and fetuses. Tiny amount of poisons on developing fetuses could have life-long impacts. This is especially problematic in the checkerboard landownership pattern of western Oregon, where BLM only knows where the registered water users are when using herbicides, and is unaware of thousands of unregistered water users.

The BLM should wait until studies on herbicides are complete before using them.

In April 2009, the EPA released a list of 67 pesticides that will be tested for potential to cause endocrine disruption.[4] At least two, Glyphosate and 2,4-D are being used by the BLM now, and considered for continued use under this DEIS. Based on currently available toxicity information that demonstrate effects on the thyroid and gonads following exposure to 2,4-D, there are some data supporting its endocrine disruption potential and EPA is studying this further (EPA 2005a).

The BLM should immediately halt the use of these herbicides until the EPA studies are complete. Only stopping after the studies are find harm is irresponsible.

The National Marine Fisheries Service is examining the impacts of 37 pesticides on protected salmon and steelhead, including 3 chemicals used or proposed for use by the BLM: 2,4-D, diuron, and triclopyr BEE (a form of triclopyr).[5] Instead of using those chemicals until they are found harmful, the BLM should immediately stop using until they have been found safe for fish and humans. But the BLM states they will continue to use herbicides the NMFS are examining because "BLM proposed use is not likely to substantially contribute to anadromous fish effects"[6]. The BLM cannot back-up this claim because the studies are incomplete. The FEIS should remove unsubstantiated claims like this. The BLM should not use any herbicides until studies are complete.

Likewise, the BLM should halt all use of 2,4-D until the EPA considers it further. The BLM herbicide EIS tells us:

> "On November 6, 2008, the Natural Resources Defense Council (NRDC) petitioned the EPA to revoke all tolerances and cancel all registrations for 2,4-D. As a part of the petition, NRDC asserts that the Agency did not consider the full spectrum of potential human health effects associated with 2,4-D in connection with EPA's reassessment of the existing 2,4-D tolerances, and EPA's ecological risk assessment."[7]

This assessment includes the endocrine disrupting effects of 2,4-D; information on the neurotoxicity related to 2,4-D exposure; information that products containing 2,4-D are mutagenic; data showing 2,4-D absorption through the skin is enhanced by alcohol

[4] DEIS 314
[5] DEIS 90
[6] DEIS 90
[7] DEIS 91.

consumption, sunscreen, and mosquito repellent; and information about adverse developmental effects at very low doses for exposure of infants to 2,4-D in breast milk. These are serious issues, and the DEIS states that "The BLM will comply with the final decision." But in the meantime, before the studies are complete, the BLM will increase herbicide spraying in people's drinking watersheds, public picnic areas, public right-of ways, any pipeline right-of-ways that go near homes, etc. Clearly, this is irresponsible.

The BLM must halt all use of 2,4-d until the studies find it is completely safe to use.

2. Glyphosate

We are referencing comments that address the dangers of specific chemicals in a separate document. However, in these comments, we are including more recent studies, particularly studies showing the problems with Roundup containing Glyphosate.

The recent June 23, 2009 issue of Scientific American had an article on Roundup titled: "Weed-Whacking Herbicide Proves Deadly to Human Cells"[8]. The summary says:

> Used in yards, farms and parks throughout the world, Roundup has long been a top-selling weed killer. But now researchers have found that one of Roundup's inert ingredients can kill human cells, particularly embryonic, placental and umbilical cord cells….. Glyphosate, Roundup's active ingredient, is the most widely used herbicide in the United States. About 100 million pounds are applied to U.S. farms and lawns every year, according to the EPA. Until now, most health studies have focused on the safety of glyphosate, rather than the mixture of ingredients found in Roundup. But in the new study, scientists found that Roundup's inert ingredients amplified the toxic effect on human cells – even at concentrations much more diluted than those used on farms and lawns. One specific inert ingredient, polyethoxylated tallowamine, or POEA, was more deadly to human embryonic, placental and umbilical cord cells than the herbicide itself — a finding the researchers call "astonishing." "This clearly confirms that the [inert ingredients] in Roundup formulations are not inert," wrote the study authors from France's University of Caen. "Moreover, the proprietary mixtures available on the market could cause cell damage and even death [at the] residual levels" found on Roundup-treated crops, such as soybeans, alfalfa and corn, or lawns and gardens. The research team suspects that Roundup might cause pregnancy problems by interfering with hormone production, possibly leading to abnormal fetal development, low birth weights or miscarriages.

The BLM should consider this new information and ban the use of glyphosate. The BLM must also consider the cumulative impacts of using glyphosate in watersheds with other industrial landowners using glyphosate. This is important data to consider to protect the health of the public.

Using Roundup in or above Riparian Reserve also does not comply with the Aquatic

[8] http://www.scientificamerican.com/article.cfm?id=weed-whacking-herbicide-p

Conservation Strategy.

> Fish and aquatic invertebrates are more sensitive to Roundup than terrestrial organisms. Glyphosate is generally less persistent in water than in soil, with 12 to 60 day persistence observed in Canadian pond water, yet persistence of over a year have been observed in the sediments of ponds in Michigan and Oregon.
>
> The EU classifies Roundup as R51/53 Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.[9]

Although Roundup is not registered for aquatic uses and studies of its effects on amphibians indicate it is toxic to them, scientists have found that it may wind up in small wetlands anyway due to inadvertent spraying during its application. A recent study found that even at concentrations one-third of the maximum concentrations expected in nature, Roundup still killed up to 71 percent of tadpoles raised in outdoor tanks.[10]

3. Prevention

The EIS must consider preventing the spread of weeds before resorting to eradication methods, especially when using toxic poisons like pesticides. For forestry practices, this would include avoiding large clearcut openings, exposing the forest floor to sunlight and disturbance, and promoting the spread of invasive and noxious weeds. The DEIS failed to include an alternative that fully embraces prevention by eliminating large, artificial canopy openings.

Legal and illegal Off Highway Vehicle (OHV) use is also a vector for invasive and noxious weeds. Illegal OHV use is profound on western Oregon BLM lands because, BLM claims, they have a shortage of law enforcement officers. The DEIS failed to adequately consider reducing damaging OHV use, and increasing law enforcement.

Fire suppression causes unwanted vegetation that the DIES proposes to kill with herbicides, instead of considering reintroducing a more natural fire regime. For instance, the BLM proposes to spray western juniper where it grows in what was historically a shrub/grass plant community. The DEIS says, page 8: "For example, fire suppression has resulted in a many fold increase in the number of Western junipers in eastern Oregon when compared with historic levels.... The use of herbicides could facilitate restoration of habitats for nesting sage grouse and other species."[11] The BLM ignores the potential to reintroduce fire instead of using herbicides.

Another example where the BLM refuses to prevent problems by allowing a more nature wildfire process is #4 of the The Purposes (page 8) "Manage vegetation to reduce the risk that large-scale high-intensity fires will unacceptably damage resources and human developments." It is unreasonable for the BLM to propose to use herbicides to kill fire-

[9] http://en.wikipedia.org/wiki/Roundup
[10] For the 6 references to these claims, see: http://en.wikipedia.org/wiki/Roundup
[11] DEIS 8.

suppressed vegetation before considering the use of fire itself.

The DEIS failed to include an alternative that modifies some of their permitted uses (even permitted through lack of law enforcement) that promote invasive weeds, such as OHV use, cattle grazing, regeneration harvests, and fire suppression, all of which promote the spread of invasive weeds. Instead all alternatives continue those uses unchanged, and simply increases herbicides.

There is a need to address weeds, but toxic chemicals should be used minimally and as a last resort. Maintaining native forest cover, maintaining native shrubs and grasslands, and preventing disturbance of soils, is the best prevention.

4. Jobs

The DEIS failed to consider the impact of herbicide use on local jobs. The DEIS used 2005 data – before the economic downturn, for the economic analysis. Clearly, this section should have been updated for the 2009 DEIS, and must be updated for the FEIS.

Oregon has one of the highest unemployment rates in the county. Manual vegetation control currently provides jobs. These numbers could be reduced by greater herbicide use. The DEIS should have disclosed the direct job losses for each alternative, or the job gains in alternative 1.

For unwanted native plants around recreation and industrial areas, opportunities to provide local jobs would be abundant. Yet the BLM's DEIS says nothing about this employment opportunity. Removal of blackberries and other invasive plants also provide manual job opportunities, especially to the highest unemployed sector, youth and rural residents. Instead, the DEIS only focused on the loss of jobs due to the spread of invasive plants, but never considered the gain in jobs manually controlling those invasive plants.

The DEIS states that vegetation within roads and other right-of-way is more expensive to control manually (page 5). However, the BLM failed to consider the cost of unemployment.

The DEIS tells us that under Alternative 2, no-action, 20,600 acres of manual and mechanical treatment would be performed by contract crews.[12] But the DEIS fails to tell us how many of those workers would loose their jobs under other alternatives.

Under alternative 3, the 20,600 acres of manual/mechanical treatment is reduced to 17,100 acres, thus reducing jobs. Inexplicably, the DEIS fails to explain how much more manual/mechanical treatments (and jobs) are decreased under alternatives 4 and 5.

Since so much of Oregon is owned and managed by the BLM, jobs on BLM managed lands are critically important to our economy. Failing to do any jobs analysis at all in the

[12] DEIS page 297

DEIS is irresponsible and a violation of NEPA.

5. Cumulative impacts and the ACS.

The DEIS failed to consider the cumulative impacts of herbicides to public resources on the west side of the cascades because of the checkerboard with private industrial forest owners. Private industrial forest owners spray a lot of herbicides, and they can aerial spray to within 60 feet of people's homes. They can spray right over non-fish bearing stream with virtually no buffer.

The BLM failed to consider the cumulative impacts of what the BLM wants to spray in the same watersheds. The BLM should have considered what chemicals industrial land-owners use and how it interacts or cumulatively adds to the chemicals that BLM wants to spray in the same watersheds, impacting the same fish downstream, the same water intake for a families drinking water, and the same air breathed by all living things in the area.

The BLM failed to consider the impact of spraying herbicides in riparian reserves, or herbicides that will move into riparian reserves, on meeting the goals of the Aquatic Conservation Strategy. Chemicals that harm aquatic species and native aquatic plants do not meet the ACS. Removing native plants from reserves (such as in campgrounds), does not meet the goals for the ACS.

6. Checkerboard land configuration must be considered.

Because of BLM's unique land configuration in western Oregon, a 1-square mile checkerboard of public and private lands, the use of pesticides in Oregon can have much more impacts on people.

Many of the sections interspersed with BLM land contain rural residents, with some homesteads established over a hundred years ago. Therefore the BLM in Oregon has many more family neighbors than any other BLM lands in the United States. The DEIS failed to adequately consider the impacts of spraying in the watersheds that these families use for their household drinking water. Because many of these residences were established before the advent of modern water-right regulations, there are countless streams of domestic water use that are not registered with the state.

The BLM does claim they are allowed to pollute drinking water with 70 ug/l of 2,4-D, 700 ug/l of glyphosate, 500 ug/l of picloram, and 210 ug/l of heazinone[13], including the cumulative impacts of industrial forestland spraying. Before the BLM does this, they should specifically consult with the people drinking the water, and check to see if the allowed pollutants could impact any special health conditions of that population.

[13] DEIS 160

The BLM is allowing herbicide spraying as close as 100 feet to people's houses[14]. In the past, (alternative 2) the BLM has even been misleading about spraying in people's drinking watersheds. For instance, take the Wolf Pup timber sale in Medford BLM. During scoping, citizens asked that none of the logging roads above property owner's water intakes, roads that would be used for logging trucks in the Wolf Pup project, be sprayed with herbicides.

The BLM responded in the EA: "No herbicides or pesticides would be used in conjunction with this project"[15]. What they failed to say is that herbicides or pesticides would be used in conjunction with another NEPA analysis – the previous BLM vegetation EIS and perhaps a programmatic CE that allows spraying herbicides before logging roads are used for a timber sale. The Medford BLM used confusing language in the EA about "treating" weeds, completely failing to disclose that the treatment would include using herbicides – even after the public specifically asked them not to use herbicides.

New herbicide treatments tiered to this DEIS could include the same problems. There are no automatic neighbor notification and confusion remains on how herbicides will be used for specific projects. Herbicide applications will likely be Categorical Excluded from NEPA, which means that the public will now know about the spraying until after it occurs. (CE's only appear in the Quarterly Planning Updates after the occur).

7. Commodity Production

The DEIS states (page 1 and 14): "This EIS does not propose the use of herbicides specifically for commodity production such as projects to improve timber growth or livestock forage." This statement is not reflected in the rest of the DEIS. Throughout the DEIS, the BLM describes how vegetation impacts commodities and economics, and the need to remove weeds to increase commodity production. For instance, the DEIS describes how ranching and logging on lands adjacent to BLM will commercially benefit by the BLM using herbicides.

Another example (page 9) describes how herbicides will be used to control Sudden Oak Death because the BLM needs to protect the local nursery industry: "Many of Oregon's plants are also used by the nursery industry and transported worldwide."

The DEIS describes how herbicides are needed to protect tree-plantations from undesirable weeds (page 246) that "slow regeneration and tree seedling growth". This is an entire section on the environmental consequences on timber production.

In fact, it is the goal for greater commercial production and higher economic return that drives most of BLM's herbicide use – everything from roadside spraying for log truck passage to utility right-of-ways, to cheat grass spraying to increase cattle grazing.

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[14] DEIS 414

[15] Wolf Pup Project EA. BLM Medford District, Glendale Resource Area. October 2009. Page 81.

Clearly, the BLM mis-spoke when claiming commodity production has nothing to do with their decisions to use herbicides or not.

8. Spraying regeneration harvests.

At the scoping meeting in Roseburg, the BLM emphasized that herbicide spraying would never be used to enhance commodity production of public forests. However, when asked if this DEIS would allow spraying of regeneration harvests, the BLM was unsure. While spraying would not be used for commodity production, clearcuts do promote unwanted weeds, so spraying of regeneration harvests is likely. In fact, page 49 of the DEIS shows a picture of a helicopter aerial spraying a clearcut.

In spite of these scoping comments, the DEIS failed to make it clear if spraying of regeneration harvests would be allowed under any alternative, and if aerial spraying of regeneration harvests is allowed under the no-action alternative and alternative 5.

The DEIS failed to adequately consider the detrimental impacts of aerial spraying thousands of acres of clearcut forest land, such as spraying near people's homes, spraying over small headwater streams, impacts to amphibian species, impacts to species that are drawn to forest openings, and increased cost of forest management.

There are many unknown variables that could occur during spraying, such as a change in wind speed or direction, a temperature increase volatizing the poisons, human error, unclear boundaries around domestic water sources, etc.

9. Aerial Spraying

Only alternatives 3 and 4 do not permit aerial application of herbicides west of the Cascades[16]. This should be a part of all action alternatives. It should especially be a part of alternative 2, the current herbicide program.

As far as I'm aware, the BLM currently does not do aerial applications of the four herbicides currently used. Therefore, alternative 2 should also prohibit aerial spraying to be a true no-action alternative. The BLM must explain why this change is proposed in alternative 2.

West of the cascades the BLM lands are intermixed with private lands. The nightmare of all nightmares is when, the forest behind your house is clearcut and then the helicopters start aerial spraying chemicals, chemicals still under study for their health effects.

Helicopters cannot spot small, intermittent streams from the air, and thus could spray directly into flowing water. Doing this in the checkerboard is irresponsible, especially

[16] DEIS 17

with such horrific chemicals as 2,4-D.

The EA confirms that for aerial spraying west of the cascades, "high density of streams, seeps, and other water bodies, coupled with dense vegetation, can make water difficult to avoid. Steep varied terrain coupled with tall vegetation (including dead trees) can force pilots to fly relatively high, increasing the risk of drift to water, non-target plants, and other non-target areas. Checkerboard and other land ownership patterns, some related to the far higher population density west of the Cascades, also tend to make aerial application more difficult."[17]

The SOPs say: "...avoid aerial spraying near agricultural or densely populated areas."[18] This seems to imply that rural residents are not avoided. Clearly, all aerial spraying in western Oregon must be prohibited (not simply avoided).

10. Sudden Oak Death

The DEIS described the eradication of Tan Oak in SOD areas. However, the BLM failed to discuss where SOD eradication will stop, or the impacts of spraying more acres, including wildlife-important oak woodlands containing black oaks. We are concerned that this DEIS will allow the BLM to kill black oaks (or other tree species susceptible to SOD). Oak trees are critically important to wildlife, both as a food source and for nesting. The BLM should not kill any black oaks at all. The only way to find which black oaks are resistance to SOD would be to see which trees survive. Killing healthy black oaks that might get sick in the future would be a travesty.

11. Human Error

The DEIS failed to adequately consider the impacts of mistakes, impacts to the ACS, wildlife, and human health. Mistakes will happen and herbicides will be applied in places and at times that are not allowed.

As an example, the Roseburg BLM mistakenly allowed native roadside vegetation to be killed with herbicides in an application near the Myrtle Creek timber sale in 2007. When we examined the units in preparation for commenting on the Environmental Assessment, the smell of herbicides was overwhelming, and dead thimbleberry, a valuable wildlife food, was dying in large clumps near the road, including near culverts (riparian areas). Even though we later found out that 2-4D was used, there was no notices posted along side the road, where the public travels (like families with children and dogs). We were especially concerned because we knew of landowners who had spring boxes for their household water use, beneath the roads in the project area.

When we asked the BLM for an explanation, we were told that there was no requirement

[17] DEIS 22
[18] DEIS 406

to post signs in an area has been sprayed (unfortunately the DEIS did not change that.) The BLM also responded they had contracted the spraying to the Douglas Soil and Water Conservation District. Ralph Thomas replied:

> "The instructions given by the BLM to the Douglas Soil and Water Conservation District were that only Scotch broom and blackberry were to be sprayed. Consequently, the information you provided came as a surprise. I had two of my resource supervisors and Field Office botanist conduct an inspection of a number of roads that were to be sprayed to judge what the outcome of the treatments had been. On several roads they found impeccable compliance with the directions given, while on other roads they observed circumstances similar to what you described.
>
> As a follow-up, the Field Office botanist and environmental coordinator arranged for an on-site review with the program administrator from the Douglas Soil and Water Conservation District and a foreman from one of the crews that conducted the spraying to discuss what had occurred and why. Following are some of the observations and conclusions reached during the meeting.
>
> First, these crews also work on private timber lands where the use of herbicides is not subject to the same limitations that exist on BLM lands. On private lands herbicides are used in lieu of brushing to control vegetation encroaching on roads. Consequently, some of the applicators sprayed willow and big-leaf maple even though they were not supposed to do so. The Douglas Soil and Water Conservation District representative recognized and stated that he would likely need to conduct additional orientation for contractors stressing the difference in the objectives of herbicide use on federal and private land and the need to adhere to the instructions for application on BLM lands.
>
> Second, not all of the spray damage was intentional or permanent. In many instances there were maple saplings growing amidst brakes of Scotch broom and blackberry. These maples were subject to the inadvertent effects of drift and volatilization of the herbicide, leading to some loss of foliage that, in most cases, was not deemed sufficient to kill the trees.
>
> Third, there have been other landowners with intermingled holdings who have been conducting herbicide treatments in the area. This was evident in one area visited, as the herbicide could still be smelled. Such was not the case on BLM roads where applications were made a month and a half ago. It is also unclear as to whether or not the individuals who were spraying private lands may also have inadvertently treated some roads on BLM lands."[19]

While we appreciated the clear explanation, and BLM's suggestions to avoid these types of human errors in the future, this example is the type of problems encountered when dealing with powerful herbicides in public areas. It is an especially good example of the

[19] Letter from Ralph Thomas, Field Manager, S. River Field Office, to Francis Eatherington. 9-28-2007

problems encountered when working within the unique checkerboard land situation in western Oregon. Knowing the locations of land boundaries is difficult, both for BLM contractors and private land contractors, and for both ground and aerial applications. Human error is inevitable and should have been considered in the DEIS.

The different vegetation control techniques of industrial and BLM lands in the checkerboard are also prone to repeated human error. Human error can occur in technique and land-ownership in either ground or aerial herbicide applications. This is especially problematic because of the use of the areas by the public, including children and pets, and including domestic water sources.

The DEIS failed to adequately consider that human error will occur, that increased herbicide use will have increased human error, and what those impacts to the environment and the public are.

12. Global Warming

Herbicides are a petroleum product, and thus their use increases the problems of global warming caused by the extraction and use of fossil fuels. The DEIS failed to consider this, or consider the increased costs of petroleum products as this resources becomes more scarce.

The DEIS claims manual methods of weed control is not desirable because those methods use fossil fuels[20], but never admits that herbicides are made from fossil fuels, and their application uses fossil fuels, equating to likely a far greater fossil fuel use than manual control methods.

Every BLM project should consider the impact on carbon storage, including this DEIS.

In conclusion:

The BLM has been successful in controlling weeds over most BLM managed lands without herbicides over the last couple of decades. The DEIS failed explain what is wrong with increasing current use of manual controls, as well as increasing prevention techniques, before increasing the use of herbicides.

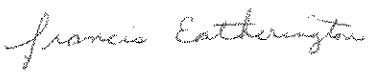
The DEIS failed to consider the impacts of pesticides even if label instructions are followed. Labels often do not consider the latest scientific findings, such as new information on impacts to amphibians and long-term impacts to human health. In fact, many pesticides are released for use while still undergoing tests. Many tests do not consider the impacts on developing fetuses, the very old, or people with a weakened immune system. Especially in developing bodies, even a very tiny amount of chemicals can severely impact brain or hormonal development at certain times.

[20] page 9

Also consider comments submitted in 2006 on the BLM's *Draft Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic EIS* (DEIS) and *Draft Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report* (PER). In particular, consider comments dated February 10, 2006, submitted by Sagebrush Sea Campaign and Caroline Cox[21], on behalf of signers below. Appendix J, Table 1 on page 105, lists many of the herbicides proposed by BLM in Oregon and their health effects, with clear and compelling references. Please consider these health impacts on Oregonians, and eliminate the herbicides that are on the Pesticide Action Network's "bad actor" list, which was created to identify "most toxic" pesticides. Oregonians deserve to live healthy lives, with pesticide-free watersheds and wildlife.

Sincerely

Francis Eatherington



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[21] PDF file of these comments are available upon request.