

March 29, 2002

Brian C. Amme  
Nevada State Office (NV 930)  
Acting Project Manager  
1640 Financial Blvd.  
P.O.Box 12000  
Reno, Nevada 89520-0006

Dear Brian Amme:

The undersigned organizations request that the Bureau of Land Management include an alternative we are drafting in the *Draft Environmental Impact Statement for Vegetation Treatments, Watersheds and Wildlife Habitats on Public Lands Administered by the Bureau of Land Management in the Western United States, Including Alaska* (DEIS). The alternative focuses on preventing and treating the spread of invasive species and restoring native ecosystems. A summary outline of our alternative, entitled the "Restore Native Ecosystems Alternative," is attached. In telephone conversations with Caroline Cox and Mark Salvo, you indicated that we could submit an outline of our alternative by the end of the scoping period, and submit our fully-developed alternative within the next 4-6 weeks (when the BLM is expected to complete its own alternatives). We will forward our full alternative by April 28, or when the BLM is has prepared its alternatives, whichever comes later.

The Restore Native Ecosystems Alternative is within the scope of the EIS as required by the National Environmental Policy Act. The January 22, 2002, *Federal Register* notice regarding the EIS states that "the BLM will prepare a national, programmatic EIS and conduct public scoping meetings on (1) management opportunities and treatment methods for noxious weeds and other invasive species, and (2) the conservation and restoration of native vegetation, watersheds, and wildlife habitat" (Vol. 67, Number 14, pp. 2901-2903). Because the Restore Native Ecosystems Alternative proposes management and treatment activities for noxious weeds and other invasive species, focuses on the conservation and restoration of native vegetation, watersheds, and wildlife habitat, and covers the geographical area identified in the scoping notice, it falls within the scope of the EIS.

The Restore Native Ecosystems Alternative proposes that the most effective method of managing and treating noxious weeds and other invasive species combines specific post-invasion treatments with minimizing the conditions favoring their spread. Indeed, the scientific literature overwhelmingly states that conserving and restoring native vegetation, watersheds, and wildlife habitat is best accomplished in this manner. For instance, the Invasive Species Council's *National Management Plan: Meeting the Invasive Species Challenge* states "[t]he first-line [sic] of defense and, over the long term, the most cost-effective strategy against invasive species is preventing them from being established" (p. 25). *Meeting the Invasive Species Challenge* also notes that "[r]estoration is an integral component of comprehensive prevention and control programs for invasive species..." (p. 35).

The Restore Native Ecosystems Alternative is also reasonable as required by the National Environmental Policy Act. In the "Questions & Answers" posted on the BLM website regarding this EIS (<http://www.blm.gov/weeds/VegEIS/faq.htm>), one of the stated purposes of the EIS is "to provide general guidelines that can be used by BLM staffs at the field level for local land-use planning" for vegetation treatments that lead to the conservation and restoration of vegetation communities, watersheds and wildlife habitats. The Restore Native Ecosystems Alternative proposes general guidelines and reasonable management and treatment activities that will both reduce the impacts of noxious weeds and contribute to the conservation and restoration of vegetation communities, watersheds and wildlife habitats. Our alternative simultaneously provides for long-term and reasonable multiple land uses. It does not propose specific land use prescriptions or allocations. We therefore request that our alternative be fully analyzed in the EIS according to National Environmental Policy Act and applicable regulations.

In order to address all the topics to be covered in this EIS, we would appreciate receiving, as soon as possible, a list of the topics that the other, BLM alternatives will address. Please send these to Anne Martin, American Lands Alliance, [annem@americanlands.org](mailto:annem@americanlands.org) or P.O. Box 8664, Reno, NV 89507, 775-786-1658.

Sincerely,

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