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National Vegetation ETS
BLM Nevada State Office
P.O. Box 12000
Reno, Nevada 89520-0006

SUBJECT: Draft Programmatic EIS and Environmental Report Treatments on
Public Lands Administered by the BLM in the Western United States,
Including Alaska Project No. 05-5914

To Whom It May Concern:

1 The Resource Development Coordinating Committee (RDCC) has reviewed
this proposal. After detailed consideration, the Division of Wildlife Resources and
Department of Agriculture and Food both support the Preferred Alternative
(Alternative B) and comment as follows:

Division of Wildlife Resources

2 Because of a lack of meaningful mitigation for past development, improper
grazing practices, fire suppression, invasive species, and other factors, shrubsteppe
habitats in Utah (and across the west) are in decline, and species dependent on these
habitats generally show declines in population and/or distribution. As a result, a
number of shrubsteppe dependent species, such as Greater Sage-grouse, are included in
the *Utah Sensitive Species List*, as well as in other designations of at-risk species.

In order to recover shrubsteppe habitat and its associated wildlife species, an
active and aggressive restoration effort is needed. Consequently, the UDWR and the
Utah Partners for Conservation and Development, which includes the BLM, have
begun a partnership-based initiative in Utah to restore shrubsteppe habitats throughout
the state. This initiative can succeed only if land managers have the tools needed to

restore degraded habitats.

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Many impacted shrubsteppe habitats are threatened by invasion from exotic and undesirable grasses, such as cheatgrass. The UDWR therefore supports the aspects of the preferred alternative (Alternative B) that would allow for the use of new herbicides on BLM lands. In particular, we support the option to use Plateau® (active ingredient imazapic) to control cheatgrass and other undesirable invasive plant species. Past experience has shown that Plateau® can be an invaluable tool for controlling cheatgrass. Without the use of available herbicides in its vegetation management toolbox, the BLM will not be able to conduct effective restoration on a scale sufficient to stop or reverse the current rate of shrubsteppe loss.

Department of Agriculture and Food

Upon consideration of the alternatives, detailed below, the Utah Department of Agriculture and Food also strongly supports the preferred alternative (Alternative B).

Herbicides are an effective, necessary, and environmentally sound tool for the control of weeds and brush on rangelands.¹ Mechanical, biological, burning, and chemical are all viable methods for control of unwanted plants. Each of these tools has their proper place in selective plant control. Use of herbicides can be very important and necessary when mechanical, biological, or fire techniques would not be effective as or more expensive than chemical methods. Proper use of the most effective herbicide for a specific vegetation treatment will result in overall decreased use of herbicides. Restoring weed infested rangelands to properly functioning systems will result in resilient rangelands that are more productive and resistant to disturbance like wildfires. The continued expansion of invasive weeds will lead to increased fire frequency, less production, and unstable rangelands. Herbicides can often be used where mechanical treatments cannot be used due to topography. Some herbicides are selective or can be selectively applied so damage to desirable species can be minimized. In order for an herbicide rehabilitation program to be successful aerial application and the use of ALS inhibitor herbicides is necessary. Limiting or completely disallowing the use of herbicides on BLM land will result in greater economic hardship for neighboring properties (federal, state and private) as wildfires, invasive plants and erosion problems know no boundaries. Herbicide use is strongly regulated and all herbicides must first be approved by the EPA before they go on the market.

¹Young, J. A., R. A. Evans, and R. E. Eckert, Jr. 1981. Environmental Quality and the Use of Herbicides on *Artemisia/Grasslands* of the U.S. Intermountain Area. Agric. Environ. 6:53-61.

Alternative A .No Action Alternative

The continuous degradation of BLM land is evidence that Alternative A does not provide the tools needed to stop the spread of invasive weeds and to prevent catastrophic wildfires. BLM lands will continue to degrade at an accelerated rate if vegetation treatment continues under alternative A.

Alternative B .Expand Herbicide Use and Allow for Use of New Herbicides

The product imazapic will result in more resilient plant communities that do not need annual herbicide treatments. This product is very promising in reducing the dominance and spread of downy brome (*Bromus tectorum*) (also called cheatgrass). The spread of downy brome throughout Utah has caused greater fire frequency and loss of production on many rangelands.

The addition of the two new aquatic products will allow rapid response to any aquatic weed problems. The newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied for control of numerous weed species.

Loss of the rarely used herbicides 2,4-DP, asulam, atrazine, fosamine, mefluidide and simazine is acceptable.

Alternative C .No Use of Herbicides

It has been proven in operational control programs and numerous research studies for numerous weeds (deep rooted perennial weeds, large scale infestation of annual weeds), that control efforts minus herbicides are ineffective. Without the use of herbicides, BLM land will cross biotic then abiotic thresholds and become an ecological dead end, which is unable to support livestock and wildlife. This alternative puts all adjacent lands in great risk, including private, state, and other federal lands.

Alternative D .No Aerial Applications

Technology has improved for aerial spray techniques (including booms, nozzles, especially GIS capability to spray in desired areas), aerial application of herbicides is more targeted, more efficient, creates less impacts/disturbance/drift, and can be more effective than ground applications. "Greater Drift" impact is minimized by use of selective herbicides and new application technology.

Not all BLM land in need of a vegetation treatment has terrain conducive to ground application. Use of manual or ground application equipment to spray rough terrain can result in herbicide overlap and skips, resulting in either damage to desired vegetation or leaving invasive plants to re-populate the area. Some critical habitat areas are only accessible for vegetation treatment by air. Some invasive plants, such as large stands of saitedar and Russian olive, are best treated by air when considering an economical and effective treatment. The EIS correctly

outlines how aerial application is more cost effective than ground application.

Alternative E .No Use of Acetolactate Synthase-inhibiting Herbicides Emphasis on passive restoration

Restricting the use of ALS herbicides would not give BLM all of the available tools that are necessary to fight against the invasion of weeds. Selective herbicides that promote release of desired vegetation, both grasses and broadleaves, and control deep-rooted perennials are metsulfuron or imazapic for mustard control, imazapic for control of Dalmatian toadflax, leafy spurge, mustards, Russian knapweed, bindweed, plus others. Aerial application of imazapyr for saited cedar control causes no soil disturbance. The product imazapic is of particular interest to control downy brome, but would be banned under this alternative. The best treatment of Whitetop is metsulfuron or imazapic. This invasive weed will never have a biological control due to similarities with crops, and because it is a deep rooted perennial, mechanical or cultural practices due not result in control. No other herbicide in the EIS will control whitetop. This alternative is thus unacceptable.

Utah's Noxious Weed Program –Synergistic Partner with **BLM and Alternative B.**

In sum, the control of noxious weeds in the state of Utah is a very important and high priority program. The Utah Commissioner of the Department of Agriculture and Food, Leonard Blackham, has declared that the control of noxious weeds is one of the top three priorities for the Department.

Utah's 29 counties have weed control programs. There are also 23 Cooperative Weed Management Areas established in the state. These groups work diligently and cooperatively with state and federal agencies and private land owners to control and prevent the spread of noxious and invasive weeds. BLM is one of the larger partners with responsibility for 72% of the land in Utah. Alternative B is the best tool for the cooperative weed control effort in Utah.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Resource Development Coordinating Committee, Public Lands Section, at the above address or call Jonathan Jemming at (801) 537-9023 or Carolyn Wright at (801) 537-9230.

Sincerely,

John Harja
Director
Resource Development Coordinating Committee
Public Lands Section

