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**Brian Amme, Vegetation EIS Project Manager
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RE: Comments to the draft Vegetation Treatment Using Herbicides on BLM Lands in 17 Western States Programmatic EIS (PEIS)

1 The Albany County Weed & Pest Control District strongly supports Alternative B – Expand herbicide use and allow for use of new herbicides in 17 western states.

2 Herbicide applications are an effective method of controlling many of the noxious weeds that threaten public lands and often spread to adjacent private lands. Herbicides are often the most effective and economical way to treat some of the perennial noxious weed species (such as leafy spurge, hoary cress, and saltcedar) that are not easily controlled with fire, mechanical treatments, or biological agents. The current list of approved herbicides for BLM lands should be updated and expanded to include newer herbicides and chemical technologies that can benefit the vegetation management program the BLM conducts. There should also probably be a more time efficient process to add new acceptable, more herbicides to the list as better chemical technology becomes available.

3 Alternative A would not allow for the use of newer herbicides that are not currently on the BLM list. Some of the new herbicides can offer better control of target species and less non-target vegetation damage. Examples include using: Milestone (aminopyralid) instead of Tordon, Plateau (imazipic) in riparian areas or instead of glyphosate for cheatgrass.

4 Alternative C would eliminate using herbicides - a vital tool in the fight against noxious weeds and for vegetation management purposes. For tough perennial noxious weeds, fire, mechanical, and biological control methods alone are typically not enough to bring these species under control; a combination with herbicides is usually preferred. One good example of how Alternative C would work would be with Saltcedar. Larger established plants can not easily be removed by digging them up, which is also a very expensive operation. Fire and mowing remove above-ground material, but have little effect on roots, which soon sprout more stems after treatments. Biological control of this species has only just begun and is still in the trial stages, and may take years to become a widespread treatment option. These three options alone would likely result in the spread of uncontrolled saltcedar (while waiting for biological control) or wasting a lot of money on treatments that have a low success rate (digging) or simply do not work at all (cutting and burning).

5 Alternative D would eliminate herbicide applications in areas with rugged, inaccessible terrain and for large scale projects. Herbicides can be applied to cheatgrass and brush species for

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cont. fire management purposes. On a lot of steep rocky hillsides, where cheatgrass is commonly taking over in Albany County, it is typically not possible to use motorized vehicles to apply treatments. Backpack treatments in these areas can be difficult due to inaccurate calibration and coverage and are inefficient. The best way to treat rugged areas and large scale projects efficiently, accurately, and cost-effectively is with aerial treatments.

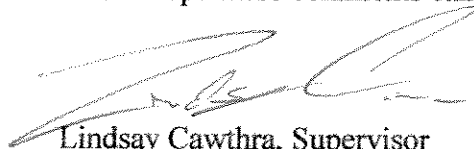
6 Acetolactate Synthase-inhibiting herbicides including Arsenal and Habitat, Telar, and Escort are necessary herbicides for treating noxious weeds and brush. These herbicides are vital in controlling species such as: Saltcedar, Hoary cress (whitetop), Perennial pepperweed, Black henbane, Houndstongue, Dyers woad, Russian knapweed, Dalmatian toadflax, Knapweeds, Thistles, and unwanted brush for fire management. Telar and Escort have low use rates, low toxicity to humans and animals, and less impact on the environment. Arsenal and Habitat have low toxicity to humans and animals, and have a definite role in the treatment of Saltcedar. Losing these types of herbicides would put definite limitations on successful noxious weed control.

7 The Executive Summary says that the BLM is proposing to treat an estimated 932,000 annually. Currently about 300,000 acres are being treated. This appears to about triple the acres that will be treated.

8 Albany County Weed & Pest has an assistance agreement with the BLM to inventory, treat, and monitor noxious weed populations in Albany County. We are to check for noxious weeds on BLM lands, and spray them when herbicide treatments are needed. The funding we have been obligated to complete these tasks (at the current acreage level the BLM is treating) is insufficient. In 2004, we were obligated \$3,888.58 for weed control & inventory; in 2005, we were obligated \$0.00. From 2004 to 2005, we have used \$4,009.49 (more than the available funds) to perform only essential herbicide applications. The applications were for: Saltcedar (which we do not have much of in Albany County, and would like to keep it as such, Dalmatian toadflax (which was adjacent to an area of private lands which we have been intensely treating), Houndstongue, and Diffuse knapweed. These treatments were to only a few limited areas in the county (a total of maybe 420 acres). No inventorying could be done, and not all noxious weed treatments could be done (only the bare minimum) with this amount of funding. From what we have heard from our BLM office, we probably are not going to receive any funding for 2006. Which means that for 2006 there will be no noxious weed control in Albany County; if there is, the Weed District will have to cover the cost. With the current level of funding we are receiving, we can not appropriately perform the noxious weed activities the BLM needs in Albany County.

9 The proposal is to triple the number of acres that will be treated – but if there is no funding to do so, how will that be accomplished? Funding for noxious weed treatments in Albany County is from a 2004 budget that has hit a balance of \$-120.91 for 2006. If other counties or areas are funded in the same manner, it is not possible to triple the amount of acres treated without increasing the funding on these projects. The appropriate funding should be present before proposing to increase treatments; otherwise this proposal has no legitimacy and is an unattainable goal.

10 We appreciate this opportunity to comment on the draft Vegetation Treatment PEIS, and would hope these comments can be of use to the BLM.



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