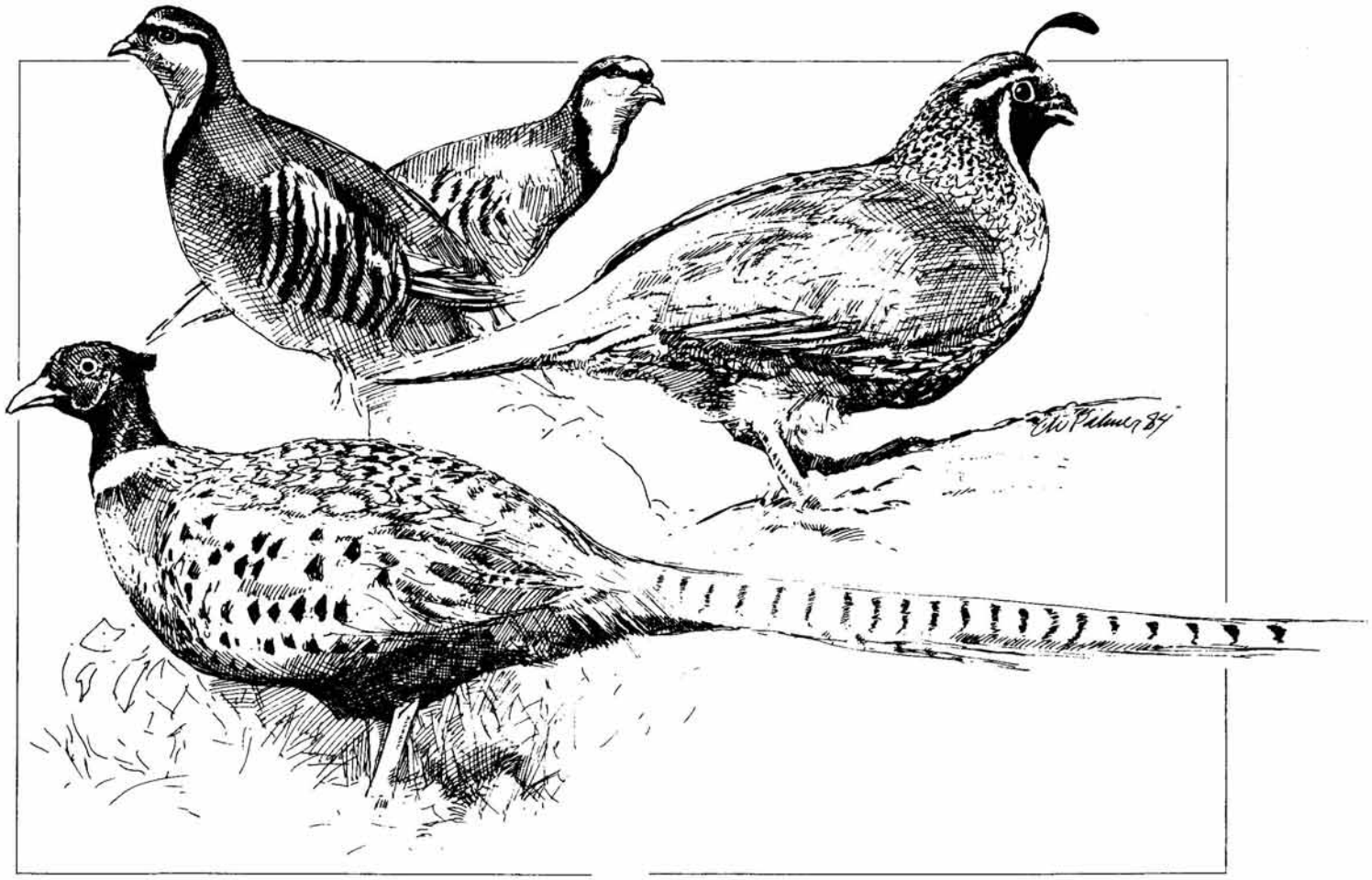
Chapter 4— Consultation and Coordination on the Draft Environmental Impact Statement



Introduction

This Environmental Impact Statement (EIS) was prepared by an interdisciplinary team of specialists from the five-state EIS area and Cornell University. Writing of the EIS began in March 1985. Consultation and coordination with agencies, organizations and individuals occurred throughout the time this document was being written, both in draft and final form.

Public Participation

In February 1985 a notice was published in the Federal Register and news media announcing the scoping period for the EIS (See Appendix B for results of scoping). A draft EIS was made available to the public on May 30, 1985. The draft stated that the public comment period would end July 31, 1985. Public meetings were held during the comment period in Roseburg, Baker, Wenatchee, Boise, Pocatello, Missoula and Miles City. The results of these meetings are available for review at the Oregon State Office.

Peer Review of the Worst Case Analysis

Although the Bureau of Land Management performed the worst-case analysis with an in-house team, a contract was let for peer review by experts. Because BLM has little toxicological expertise and because the need to ensure the accuracy of this worst-cast analysis, Labat-Anderson, Inc., a consultant firm with in-house toxicological expertise and experience in performing worst-case analysis was retained. The contract for peer review specified that the review of both the draft and final worst-case analysis should be performed by a toxicologist, a statistician, and an animal toxicologist at a minimum. The input from the peer reviewers was incorporated in this Final EIS.

Response to Comments

Common Issues

A number of broad issues were raised frequently by reviewers. These issues and responses to them are presented below.

Common Issue 1: The Proposed Action (Alternative 1) is not an integrated pest management program because it relies mainly on chemical herbicides.

Response: As a system that uses a variety of techniques to control unwanted plants or animals, integrated pest management (IPM) does not imply that chemicals would be used only as a last resort. Both effectiveness and economic efficiency would be considered in making site-specific decisions among the options. A high proportion of the expected control acreage is proposed for spraying with herbicides because existing information on infestations and the relative effectiveness and costs of possible control programs reveal that spraying is the best way to achieve a reasonable amount of control. Research into alternative control methods may in the not-distant future show that alternative techniques will do the job in some of the situations now proposed for herbicide spraying. Because the Proposed Action is an IPM alternative, alternatives to chemical herbicides would be adopted when and where they are found to be effective and efficient.

Common Issue 2: The benefits shown do not justify the program—the costs outweigh the benefits.

Response: The main benefit of the noxious weed control on public lands is not only the prevention of economic losses related to activities on these lands but the prevention of economic losses sustained on nearby private lands that result when uncontrolled weed infestations on public lands spread to infest and reinfest the private lands. As the Governor of Montana stated in comment letter 64:

> "If weeds are not controlled or contained, they provide a constant source of infestation and economic impact to all adjacent lands as well as to land downstream. BLM involvement in areawide or community-wide coordinated management projects is the most practical solution to controlling the spread of weeds."

The Purpose and Need section of Chapter 1 has been revised to better reflect the rationale for this program.

Common Issue 3: Several letters commented on the need to be specific on buffer zone requirements for surface waters, and several assumed that BLM would be relying solely on state standards.

Response: Buffer zones to protect surface waters are based on local conditions, and state regulations and guidelines. Site-specific environmental analysis and appropriate documentation will address what buffer zones are needed to protect water quality, riparian habitat, and fisheries.

Common Issue 4: Several letters suggested changes in Appendixes A and D.

Response: Appendix A simply reprints the two Federal Laws that deal specifically with noxious weeds. It will not be changed. Additions have been made to the maps (Appendix D) showing distribution and spread of selected noxious weeds in response to comments.

Common Issue 5: Several letters expressed concern about monitoring and studies.

Response: The general guidelines for weed control monitoring are as follows (monitoring may vary from state to state depending on funding levels and other considerations):

Pre-treatment—(1) representative sites will be selected for soil types, slope, and vegetation; (2) visual on-site checks will be made of both target and nontarget species; and (3) photo points may be established.

Post-treatment—(1) on-site checks to assess effects on target and nontarget species will be made; and (2) photos may also be taken.

Pre-treatment and post-treatment vegetation and water quality monitoring and studies will be addressed in site-specific environmental analyses with appropriate documentation.

Common Issue 6: Several letters commented on indirect and direct effects on vegetation, water, wildlife, and other resources.

Response: In addition to specific comment responses and text changes addressing some of these concerns, a brief description of the size of areas treated with herbicides, rates of herbicide application, herbicide selectivity, and time of application have been included in Chapter 1 (Weed Management Treatments, Chemical Methods) to clarify the magnitude of the program and put it more in perspective. This may help alleviate some of the concerns people have on direct and indirect effects.

Common Issue 7: Several letters commented on the spread of weeds.

Response: Weed species are spread by one or both of the following means:

(A) All weed species are spread by seed. The methods of seed dispersal include (1) wind; (2) water; (3) animals, including humans; (4) crop seed, grain, hay, and straw; (5) machinery, including automobiles, motorcycles, trucks, and cargo and other machines; (6) weed screening; (7) use of weeds as ornamental plants, and (8) sale of wildflower seeds that include the seeds of such noxious weeds as knapweed.

(B) Vegetative reproduction occurs by stems, roots, leaves, or modifications of these basic organs such as rhizomes (underground horizontal stems), tubers, corms, bulbs, and bulblets. Humans are the greatest agent of this method of spread.

Weeds do not spread by just one method, but humans are the most important agent of their spread. Almost all noxious weeds are introduced plants from foreign countries, some introduced as impure seed and food and others as ornamentals and packing material. All groups affected by noxious weeds should become aware of these weeds, be able to identify them, and be familiar with their methods of spread so that preventative weed control programs can be effective.

Common Issue 8: Several letters expressed concern about the nature of biological control methods.

Response: Biological weed control is the deliberate use of natural enemies (parasites, predators, or pathogens) to reduce weed densities to tolerable levels. Insects are the main natural enemies being used. Other natural enemies include mites, fungi, and nematodes (pathogens).

Some of the advantages of using natural enemies to control weeds are that (1) they are self-perpetuating, (2) they can be comparatively economical once studied and established, (3) they can be highly selective, (4) they offer a high degree of environmental safety, and (5) they do not require fossil fuel energy.

Biological control, however, does have limitations because (1) it is a slow process, (2) it does not achieve eradication but merely reduces weed

densities to more tolerable levels, (3) it is highly selective, attacking one weed existing among a complex of other weeds, (4) it cannot be used against weeds that are valued under some situation because insects or pathogens do not recognize boundaries, (5) it cannot be used against weeds that are closely related to beneficial plants because the insects or pathogens may be unable to discriminate between related plant species, (6) it cannot be used against weeds when it requires an alternate host that may be a beneficial plant, and (7) it cannot be combined with the use of herbicides in the same area.

Although discussed as biological agents, sheep and goats are not truly biological agents but are domestic animals used to control only the **topgrowth** of certain noxious weeds. The following are some of the advantages of using sheep or goats for noxious weed control: (1) they use weeds as a food source, (2) following a brief adjustment period, they sometimes consume as much as 50 percent of their daily diets of this species, (3) average daily gains of offspring grazing certain weed-infested pastures can sometimes be significantly higher than average daily gains of offspring grazing grass pastures, and (4) sheep or goats can be used in combination with herbicides.

Some of the disadvantages of using sheep or goats are (1) they also use nontarget plants as food sources, (2) the use of sheep or goats requires a herder or temporary fencing, (3) sheep and goats may be killed by predators such as coyotes, (4) heavy grazing of some weed species, such as leafy spurge, tends to loosen the stool of the grazing animals, and (5) most weed species are less palatable than desirable vegetation and would cause overgrazing.

To develop a biological weed control program, the following steps must be taken:

(1) Identify weed species and determine origin.
(2) Determine if any natural enemies occur at the point of origin.
(3) If possible, collect natural enemies.
(4) Hold preliminary screening trials on the natural enemies of the weed in the United States.
(5) Hold further screening trials in the United States.
(6) Raise biological control agents before first release.
(7) Release biological control agents for first time onto selected sites.
(8) If biological control agents survive and increase in numbers, collect agents and release onto other sites of weed infestation.

Usually a complex of three to five different biological agents, such as insects, must be used to attack an individual weed infestation site. But even with a complex of biological agents, often 15 to 20 years are needed to bring about an economic control level, especially on creeping perennials. In most circumstances, biological control agents are not performing control. They are only creating stresses on the weeds, which is not the same as control.

As biological control agents become available, BLM will continue to increase their use. Estimated costs to develop a biological control program per weed are as follows.

(1) Overseas studies, involving the survey, biological investigation, and collection of organisms attacking the weed: $1.2 million to $1.5 million.

(2) Survey of organisms already present on weeds in other countries, such as Canada, or other states: $300,000.

(3) Screening studies to determine the host range and safety of the candidate biological control agent: $150,000.

(4) Post-release studies to determine the survival and impact of the agent on the weed: $75,000.

(5) Collection from an established population of biological control agents and release to new areas of weed infestation: $3 to $15 per acre.

Specific Written Comments

Each person, organization or agency that provided written comments was assigned an index (letter) number in consecutive order as received. Appendix material was enclosed with letters 39, 43, 59, and 71, and is available for review at the Oregon State Office.

Letter No.	Agency, Organization or Individual
1.	National Association of Conservation Districts—Salem, Oregon
2.	USDA-Soil Conservation Service—Oregon State Conservationist
3.	University of Idaho—Professor Lambert C. Erickson
4.	Kay Nollenberger
5.	Montana Historical Society—Helena, Montana
6.	USDA-Soil Conservation Service, Idaho State Conservationist
7.	Mary L. Cookman
8.	Executive Department—Intergovernmental Relations Division, Oregon
9.	USDA—Soil Conservation Service, Montana State Conservationist
10.	Morrow County Weed Control, Heppner, Oregon
11.	Oregon Natural Heritage Data Base, Portland, Oregon
12.	Idaho Department of Lands, Soil Conservation Commission
13.	Idaho Department of Agriculture, Weed Control Coordinator
14.	Idaho Farm Bureau Federation, Pocatello, Idaho
15.	Montana Department of State Lands, Reclamation Division
16.	Harry McNeal
17.	USDI-Bureau of Reclamation, Boise, Idaho
18.	Montana State University, Cooperative Extension Service
19.	Washington Department of Natural Resources, Lands Division
20.	Thomas Haensly
21.	Wood River Resource Conservation and Development Area, Gooding, Idaho
22.	George Wooten
23.	Coos-Curry Council of Governments, Coos Bay, Oregon
24.	Valley County Weed Control, Glasgow, Montana
25.	Prairie County Weed Board, Terry, Montana
26.	Wyoming Farm Bureau, Laramie, Wyoming
27.	University of Idaho, Fremont County Extension Agricultural Agent
28.	Valley County Board of County Commissioners, Glasgow, Montana
29.	Tri-State Weed Coordinating Committee, Logan, Utah
30.	Bonneville County Weed Control, Idaho Falls, Idaho
31.	Idaho Department of Fish and Game
32.	Tillamook County Soil and Water Conservation District, Oregon
33.	Washington State Department of Game
34.	Wyoming Office of the Governor
35.	University of Idaho, Custer County Extension Agent
36.	Montana State Rural Areas Development Committee
37.	Tom Chivers, Custer County Commissioner, Challis, Idaho
38.	Michael Pilarski
39.	Fred H. Mass
40.	Oregon State Department of Agriculture, Weed Control Program
41.	Washington State Department of Fisheries
42.	John R. Swanson
43.	Southern Oregon Northwest Coalition of Alternatives To Pesticides
44.	Natural Resources Defense Council, Inc., San Francisco, California
45.	Earth First, Grants Pass, Oregon
46.	Prairie County Cooperative State Grazing District, Terry, Montana
47.	Richland County Weed Board, Sidney, Montana
48.	Montana State University, Richland County Agent
49.	Prairie County Conservation District, Terry, Montana
50.	Washington Native Plant Society, Seattle, Washington
51.	USDI-National Park Service, Pacific Northwest Region
52.	Audubon Society of Portland
53.	Montana State University, Extension Weed Specialist
54.	Okanogan County Cattlemen's Association
55.	Department of Energy Bonneville Power Administration
56.	Idaho Natural Resources Legal Foundation, Inc.
57.	Okanogan County Noxious Weed Control Board, Washington
58.	U.S. Senator Steve Symms, State of Idaho
59.	Northwest Coalition for Alternatives to Pesticides
60.	Idaho Cattle Association, Boise, Idaho
61.	USDA-Forest Service, Washington, DC
62.	USDI-Geological Survey, Reston, Va.
63.	Montana Public Lands Council, Helena, Montana
64.	State of Montana, Office of the Governor
65.	USDC-National Oceanic and Atmospheric Administration, Washington,DC
66.	Washington State University, Ferry County Extension Agent

67. Idaho Wool Growers Association, Boise, Idaho
68. The Nature Conservancy, Fort Collins, Colorado
69. National Wildlife Federation, Missoula, Montana
70. Department of the Army, Corps of Engineers, North Pacific Division
71. U.S.Environmental Protection Agency, Region 10
72. Washington State Department of Ecology