ENGINEERING • SURVEYING • RESOURCES & ENVIRONMENTAL SERVICES

RESOURCE CONCEPTS, INC.

January 6, 2006

Mr. Brian Amme, EIS Project Manager
BUREAU OF LAND MANAGEMENT
Nevada State Office
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

1 Resource Concepts, Inc. (RCI) is submitting the enclosed comments regarding the DRAFT Vegetation Treatments Using Herbicides Programmatic EIS to replace the comments submitted on January 4, 2006 on behalf of the N-4 State Grazing Board. It is our hope that the BLM EIS preparation team will consider these comments when revising the Vegetation Treatment EIS for final publication.

2 The N-4 State Grazing Board has interest in the Vegetation Treatment EIS and the subsequent implications of the Record of Decision on public land livestock grazing programs and procedures as well as the Bureau's ability to conduct vegetation treatments as efficiently, effectively, and appropriately as possible. The following is a list of comments regarding the Vegetation Treatment EIS. Page numbers are included with each comment for ease of reference to specific points in the document. In general, Resource Concepts, Inc. supports the preferred alternative and we commend the BLM on completing a programmatic EIS that will allow the use of herbicides for treating vegetation throughout the Western U.S.

3 1. Pg. 4-123 In the first full paragraph of the page, it is stated that spot treatments of vegetation could be applied at any time. Caution should be taken when treating vegetation adjacent to livestock water sources. Spot treatments should not be applied around water sources in pastures with limited water when livestock are grazing in the pasture. Instead, a standard operating procedure addition could include not allowing treatment of vegetation within close proximity to water sources (especially springs, tanks, ponds, and other developed water sources) while livestock are grazing in water, limited pastures. Another standard operating procedure for small infestations and large spot treatments should include temporary fencing to prevent livestock from grazing the weed infested area, when optimal herbicide treatment times conflict with grazing plan schedules.

4 2. Pg 4-123 In the fourth paragraph on this page, herbicide treatments are being proposed to reduce the risk of future catastrophic wildfire for weeds of concern including downy brome, Russian thistle, kochia, oak, and pinyon/juniper. Herbicide

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applications of tebuthiron or other herbicides could actually increase the risk of catastrophic wildfire. Leaving standing dead trees and tree branches on-site after application of herbicide treatment could result in higher quantities of low-moisture fuels that carry fire faster and hotter than live vegetation. Reducing the percentage of live pinyon and juniper trees in an area through chemical treatment should result in less competition for native grass and forb species, which is a benefit of treatment. However, increases in grass, forb, and shrub fuels are expected and can negate the supposed "fuel reduction" purpose behind the treatment. In my opinion, chemical treatment of selected species such as cheatgrass, pinion-juniper, and some other species should only come as a last resort, unless protecting a new seeding from invasive species, for example. Fuels management grazing and biomass harvest plans should be a prerequisite to chemical applications whenever possible.

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3. Pg 4-126 In the paragraph concerning diquat, it was stated that the chemical could be of most concern if used in riparian areas where livestock are exclusively grazing. The document goes on to state that the unlikely scenario of this happening was not modeled. It should be a standard operating procedure, or part of the regulated use on diquat, that diquat will not be used in a riparian pasture while livestock are held in the same riparian pasture. Grazing duration is generally short in most riparian pastures and should allow sufficient time for livestock to be removed from the pasture before diquat treatments are applied.

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4. Pg. 4-130 In the paragraph regarding Triclopyr, there is a statement that it is important to limit exposure of cattle and horses to triclopyr sprayed vegetation until residual activity has tapered off. A time frame should be given indicating a typical time for removal of livestock from treated rangelands. If treatment areas are small, they should be temporarily fenced, or scheduled during a period of rest in the standard grazing system for the allotment affected.

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5. Pg. 4-215 In the section regarding future effects and their accumulation on livestock, there is a statement that treatments should also reduce the incidence and severity of wildfire across the western U.S. to the benefit of livestock. Vegetation treatments that actually reduce the fuel loads, or drastically redistribute them, to the point where fire behavior is altered from the original state will likely hold true to the statement above. Chemical treatments of vegetation, especially woody vegetation such as shrubs and pinyon-juniper trees in the Temperate Desert Region, do not reduce fuel loads or redistribute fuels in a way to greatly change fire behavior and fire return intervals.

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6. Pg. 4-215 It is commendable that the BLM recognizes the value of well planned and managed livestock grazing as a means of combating invasive species and as such is wiling to incorporate the use of livestock as part of the weed management program.

9 7. Pg. 4-216 Alternative E emphasizes passive restoration and removal or reduction of livestock grazing to improve ecosystem health. There are many cases when removal of livestock grazing alone is not going to improve rangeland health. Ecological sites that have already crossed a threshold, or are in the process of, are not going to recover without some type of management input, and removal of a land use is not a management input.

10 In summary, Resource Concepts, Inc. appreciates the opportunity to review the BLM DRAFT Vegetation Treatments Using Herbicides Programmatic EIS and provide comments on behalf of the N-4 State Grazing Board. We are available to discuss any of the concerns or comments outlined in this correspondence.

Sincerely,

John L. McLain
CRMC/CPESC

JLM:sta