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Subject: COMMENTS for Draft EIS

1 Converse County Weed and Pest Board of Directors and Supervisors strongly support the "Preferred Alternative B": Expand herbicide usage and allow for the use of new chemistries in the 17 western states.

2 The March/April 1997 issue of Audubon contains the article "Killer Weeds" by Ted Williams. It states that 4600 acres of public lands are being lost daily to alien plants. Every available tool under Integrated Pest Management (IPM) must be employed to stop this rapid invasion. Federal Agencies often use the analogy of wild fires/forest fires disseminating the "Smoky the Bear" messages about the importance of extinguishing isolated fires and hot spots, stopping the spread of alien plants, arresting new infestations and preventing flare ups. Washing of vehicles, weed free forage and early detection rapid response by cultural, mechanical or chemical tools (IPM), education/awareness and competitive plant species are necessary from first detection to expansion of old infestations.

3 Weeds once established with no IPM soon take over the watershed impacting desirable plant species and disrupt the food chain for the many species dependent on the community for habitat, nutritional needs and water. Allowing this near irreversible resource damage compares to giving it over to a housing development.

4 When fire or herbicides are used in a prescribed manner the end results is positive without any real adverse reaction or effect to the environment. New reduced rate herbicides, different modes of action and existing herbicides offer many choices for the task at hand when applied according to label directions. Combining chemistries of different modes or seasonal rotation of chemistries also reduces the risk of resistant plant communities.

5 The chemical listing review process needs changing to allow for new herbicides to be adopted as soon as available pending the need and safety concerns. This would allow the new chemistries to be applied to the early detection rapid response programs and provide less impact to the more critical areas. The review board should include professionals from the chemical industry.

6

Alternate B reduces the ecological, economic and burdensome impacts brought on by these environmental pollutants. Limiting effective control measures such as herbicides, can create escalating control costs, reduce stand vigor, caused by alien competition, to the desirable plant community and reduction of desirable forage for grazing herbivores.

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Drought and overgrazing by wildlife and livestock has fragmented the desirable plant communities. This brings the lands to simple succession or weeds.

8

Application methodology must be addressed. Fixed wing and choppers are a important part of the IPM tool box. With the newer application technology using GPS, milfoil booms, injector systems, and adjuvant and drift retardant additives, accuracy of rates applied and drift control minimizes negative impacts. An example is aerial work on Downy brome. Vast infestations can be done quickly, be done more cost efficient, reduce risk as well as being practical for rough terrain, timing (winter application of tebuthiuron), location and weed species.

We support Alternative B:

9

- Usage of herbicide and increase the applied acres.
- Simplify the process for the addition of new chemistries for the BLM Chemical List.
- Permit the use of aerial applications where practical.
- Address solutions for controlling invasive plants that threaten the ecology of the land and the economic burden.
- We must step out of the box to control these environmental pollutants.

For Converse County Weed & Pest Board of Directors and Supervisors.

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