

JUNTURA WEED MANAGEMENT AREA

Malheur County Weed Inspector, 251 B St. W., Vale, OR 97918, 541-473-5102



November 29, 2005

Brian Amme
Project Manager
Bureau of Land Management
Reno Nevada

Re: Public Comments on Draft Programmatic Environmental Impact Statement

Comments from: Juntura Cooperative Weed Management Area

1 The Juntura Cooperative Weed Management Area (JCWMA) is located in Malheur County of Eastern Oregon. This is a sparsely populated region of the intermountain west. The proposed Programmatic Environmental Impact Statement (PEIS) is of particular interest to our association because, approximately 80% of the land within our Cooperative Weed Management Area are managed by two of the larger BLM districts in the continental US. There are less than 20 landowners in the JCWMA and most are very proactive concerning vegetation management on their privately owned properties. With this scenario it is easy to understand why the JCWMA is keenly interested in what form the draft Vegetation EIS is adopted.

2 The situation in the western states and particularly the great basin concerning invasive plant species is dire. With about 70,000,000 acres (USDA) already infested in the eleven western states it is our belief that further delay will make the situation permanently irreversible. Obviously our association has a financial vested interest in the possibility of losing the ability to make a living on our properties. Most of the ranches within the JCWMA have a very long history and many are multi-generational operations and it is the intention of many of the members that this legacy continues from this generation to the next and beyond. There are many groups in the United States clamoring for the right to preserve their culture, but the inability of a government agency to manage invasive weed problems will result in not only the alteration or loss of an entire ecosystem and destruction of the economy, but will permanently destroy a nearly two hundred year old culture. It is unconscionable to dismiss the value of the history of this small and remote area of the Western US. There is no question that it would be disastrous for these western states if an agency charged with management of public lands were unable to manage invasive plants or animals in the best and safest possible manor. We are by no means advocating wholesale use of any and all pesticides on public land, however we believe that an equitable solution can be achieved.

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 Bur. of Land Management
 MAR 10 2006 JUNTURA WEED MANAGEMENT AREA

1:00 P.M.

NEVADA STATE OFFICE
 REVENUE DIVISION

Joe MaKay, Chairman, P. O. Box 275, Juntura, OR 97911, 541-277-3422



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Specifically, we consider the draft Vegetation EIS "Alternative B", the BLM preferred alternative too be the Juntura CWMA's preferred choice as well. While we understand the concern of some groups that any herbicide use is harmful, and we agree that indiscriminant use is wrong, we also contend that no action would destroy the fragile ecosystem of the arid west. This area is rapidly being invaded by several very aggressive non-indigenous plants. They are particularly difficult to control and in most opinions certain herbicides are the best alternative at our current level of technology. We are in further agreement with Alternative B that the addition of four new chemistries to the list is prudent given the likelihood they will be used in limited scope. One of the most important aspects of Alternative B is the ability of the BLM to consider the adoption and use of new chemistries in the future, of course after thorough ERA assessments. We believe it would be unwise not to provide for the inclusion of new chemistries in the future that may prove to be much more effective while their environmental risks may be even more minimal than currently available choices. We are certain that there is no question that the environmental damage that we have already witnessed will increase exponentially if herbicide use is curtailed or eliminated as outlined in Alternatives E & C respectively. The damage to the ecology of Eastern Oregon from invasive plants is already evident to our members based on empirical observation. Tremendous effort has been made by many scientists and resource management experts in drafting this daunting document and our opinion matches theirs that Alternative B should be adopted and at the earliest possible convenience.

Respectfully Submitted;

Members of the Juntura Weed Management Area

Joe MaKay
Melinda Bantz
Jonda Bantz