

February 8, 2006

Mr. Brian Amme
BLM PEIS Project Manager
1340 Financial Boulevard
P O Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

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The Utah Farm Bureau Federation appreciates the opportunity to submit comments on the Draft Environmental Impact Statement on Proposed Vegetative Treatments on BLM – Managed Public Lands. Recognizing that the BLM manages more than 261 million acres in the thirteen western states and forty-three percent of Utah, a healthy resource is critical to the multiple-use mission.

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Please find enclosed the Utah Farm Bureau's comments on the DEIS. Thank you for taking into consideration our comments and recommendations. Please feel free to contact me at any time. I can be reached at telephone number (801) 233-3040 or my e-mail address is rparker@fbfs.com.

Best Regards,

Randy N. Parker
Chief Executive Officer
Utah Farm Bureau Federation
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**PROPOSED VEGETATIVE TREATMENTS ON
BLM – MANAGED PUBLIC LANDS**

Comments of the Utah Farm Bureau Federation

**Randy N. Parker
Chief Executive Officer
February 8, 2006**

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The Utah Farm Bureau Federation (UFBF) is the largest general farm organization in the state of Utah representing over 20,000 member families. We represent a significant number of livestock producers who use the federal lands for livestock grazing. We appreciate the opportunity to offer comments on the Draft Environmental Impact Statement (EIS) on Vegetative Management on Bureau of Land Management (BLM) lands.

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In November 2005, Utah Farm Bureau delegates reaffirmed a long standing policy supporting “livestock grazing as an integral part of multiple-use and the management of the federal land resource.”

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Utah Farm Bureau commends the Bureau of Land Management’s efforts to focus on the social and economic contributions livestock ranching makes in the public lands states of western American. The western ranching community primarily uses the public lands to graze livestock. Historically, Congress mandated that permits to graze the public lands were in combination with their own privately owned ‘base property,’ ultimately forming viable ranching operations. Utah is a state that has nearly two-thirds of its land base managed by federal agencies. With BLM managing approximately 43 percent of Utah, it is important that the resource is productive. Proper vegetative management is critical to multiple-use values.

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Private lands in Utah are generally interspersed within the BLM lands. The use of BLM range lands is necessary for the continued viability of these ranching units. Through prudent application of multiple-use principles, renewable and abundant resources have been wisely used while protecting the many unique and sensitive parts of our state. The Taylor Grazing Act protects the historic rights of Utah ranchers and ultimately is the foundation for economic stability in many of our rural communities.

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A pro-active vegetative management plan for the BLM lands is critical to the long term health and to the survival of an economically viable western livestock ranching industry. The problems facing the BLM on over 261 million acres are staggering. Many

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western lands are adversely impacted by invasive and noxious weeds. There are problems with excessive fuel loads in some areas. Invasive and noxious plants species currently dominate more than 35 million acres, with thousands of acres more impacted each day. Wildfires in the western states reflect the fuel build-up. There is a critical need to improve the vegetative mix on the BLM lands.

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BLM must be able to fully use all of the management tools at its disposal. The immensity of the problem cannot be addressed with a one-time, short term solution – there needs to be a pro-active, long term plan identified and implemented.

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Alternative B provides the best option for the agency to pro-actively address the spread of invasive plants, to reduce the fuel loads and maintain the Congressionally mandated grazing preference.

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Historically, the Congress, the BLM and the Federal Courts have recognized that rural economic stability is an important consideration in management decisions related to the public lands. In Taylor Grazing (43 U.S.C./315), the section creating the BLM, the courts noted the purpose was to “stabilize the livestock industry.” In addition, the courts have recognized the importance of the livestock industry in economic stability of the west and as a national source of food production.

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Livestock production is the foundation of Utah’s agriculture industry, contributing 79 percent of our state’s \$1.25 billion in farm gate sales. This contribution and its economic ripple effect are significant in rural Utah. In recent years, Utah has become one of the most urban states in the nation. Rural communities continue to be left out of the economic investment and revitalization that is focused along Utah’s Wasatch Front. Multiple-use management of the public lands is critical to the economic well-being of rural Utah. The mix of private and public lands ranching for generations has created new wealth through the harvest of annually renewable forage that drives our rural economies. In addition, sheep and cattle grazing on the BLM and Forest Service lands provides a benefit to all Americans, not just those physically and financially able to visit the public lands states.

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Agriculture and related industries are the catalyst for more than 100,000 Utah jobs. In a recent annual Economic Report to the Governor, the value and importance of cattle and sheep operations was graphically presented. It reports that the multiplier (a measure of re-spending of an initial dollar) and the rate of jobs multiplier (a measure of jobs created) for the cattle and sheep industries is greater than many traditional Utah industries. The livestock sector enjoys an employment multiplier of over 50 jobs per \$1 million of economic activity which is considerably above the statewide median jobs multiplier of 20.3.

13 From a micro economic view, it is important to recognize the impact of displacing even a single average sized cattle or sheep operation. It should be noted, through an effective vegetative management plan, livestock operations can be enhanced providing greater economic benefits to rural Utah and the western states.

14 An average cow-calf operation with 500 mother cows creates a direct impact on the local economy of over \$250,000 in farm gate sales. This is based on a ninety-five percent calf crop, 550 pound feeder calves marketed and a market price of \$1.10 per pound. Market reports show that 500-600 pound feeder cattle currently selling for over \$1.20 per pound in the Great Basin region.

15 An average sheep operation with 2,000 ewes would create a direct impact on our rural economies of \$ 200,000 in farm gate sales. This figure is based on one hundred percent lamb crop, 125 pound market lambs and a market price of \$.85 per pound.

16 The impact doesn't end at the farm gate. Economists agree that livestock sales have greater impact in rural communities than in the overall state aggregate. Using a conservative multiplier of 2.5, (Oklahoma State University reports 2.72 Livestock Multiplier) either of the average sheep or cattle operations would create over \$600,000 in economic activity and provides the engine for over 30 jobs in their rural communities.

17 The Utah Farm Bureau believes the adoption of any of the other Alternatives (A, C, D, or E) proposed in the Draft EIS would be inefficient and ineffective and detract from the agency's overall goals and objectives.

18 Alternative A, the No Action Alternative, would maintain current control measures and programs. Based on the agency's own estimate that 4,000 acres daily are taken over by invasive and noxious weeds, much more is required if the situation is to be reversed. Clearly, the status quo is not a viable option.

19 Herbicide use is an important and effective tool for vegetative management, and BLM cannot tackle the enormous challenge it faces without it. The herbicides that BLM uses and proposes to use pursuant to Alternative B have undergone extensive review and scrutiny by the Environmental Protection Agency (EPA) in the registration or re-registration process, and have been found to be safe and effective for use. Potential risks are factored into the registration review process and are taken into account in developing a label for pesticide use. There is no evidence that any of the products used or proposed to be used by BLM pose human health risks when used in accordance with label instructions. Herbicides used in accordance with label instructions should not produce any potential risks that exceed acceptable safe levels for human health.

20 The EIS cites potential risks from accidental spills and spray drift. By their very nature, accidents are the unplanned exception rather than the norm, and cannot reliably be factored into risks. Spray drift issues are concerns to farmers and ranchers growing crops within or adjacent to BLM lands, but these issues can be addressed on a site specific basis. For example, other methods of control might be employed along the boundaries to agricultural fields. It should be noted, much of the vegetative management addressing invasive and noxious weeds will be isolated away from private lands and farm fields.

21 The unfettered invasion of harmful weeds onto agricultural lands and the increased threat of wildfire that could result from no herbicide use is more of a threat to such operations than possible drift issues that can be addressed locally. Alternative C (No Herbicides) is therefore not a viable option.

22 Aerial spraying is also a necessary tool for BLM in the fight against harmful invasive or noxious weeds. There are many large areas within the federal lands that are infested with invasive or noxious weeds where the only effective treatment is aerial spraying of herbicides. These herbicides can be safely applied in large, relatively isolated areas.

23 There will be areas where aerial spraying may not be appropriate and should not be used. Other types of control can be employed in such areas on a site specific basis. Aerial spraying of herbicides should not be arbitrarily denied. In areas where it is safe and where it is the most effective, aerial application should be available as a form of treatment. It is important for BLM to have all its tools available to address the daunting challenge of reducing invasive and noxious weeds and reducing fuel loads on lands under its jurisdiction. The fact that some tools might not be appropriate in some places is not a reason to arbitrarily eliminate them altogether. Alternative D should not be adopted.

24 Likewise, Alternative E is not an effective alternative. It incorrectly assumes that ALS inhibitors are inappropriate in all cases. As with aerial spraying, there will be situations where the use of these products might not be appropriate. There are, however, many situations where such materials can be used safely and effectively with no risk, or only minimal risk. As with the other alternatives, any problem areas can be addressed on a site specific basis—it is no reason to exclude the use of these products altogether.

25 Spot treatments identified in Alternative E may be appropriate in some situations, but should not be featured to the exclusion of other effective tools such as broadcast applications.

26 In addition, Alternative E features “passive” treatments such as restrictions on livestock grazing, logging and recreational use rather than “active” treatment methods. Passive management methods such as the restrictions suggested under this alternative are never more effective than active management. This is especially true in this situation,

where fuel loads and invasive and noxious weeds are increasing at a rapid pace. One of the primary goals of vegetative management is to restore vegetative health, thus reducing the damage done by wildfires. With heavy fuel build-up in many areas, active management is the only way to reduce those risks.

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Some of the proposed restrictions that would be imposed are themselves tools to manage vegetation and ultimately to accomplish the goals sought to be achieved. Livestock grazing is recognized as an effective means to reduce fuel loads and to reduce harmful invasive and noxious weeds in specific areas. In fact, livestock have been successfully used in many areas specifically for such purposes. Any management regime that restricts livestock grazing may actually be counterproductive and inconsistent with sound vegetative management.

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Utah Farm Bureau would recommend that livestock grazing should be more prominently considered in the final EIS as an integral tool for reducing fuel loads and managing harmful invasive and noxious weeds on BLM lands. Cattle, sheep and goats provide an ecologically safe and effective way to manage vegetation.

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Using livestock grazing as a way to reduce fuel loads and harmful noxious weeds might also provide an economical and efficient solution to the issue of what to do with livestock when allotments are being restored or treated. Using livestock in this beneficial way could provide a “win-win” situation for both ranchers and for the environment. This option should be better developed in the final EIS.

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In considering a broad range of tools that could be used by BLM in vegetative management, the use of prescribed fires and chaining should also be considered. Our forest and range lands have evolved over time with periodic or even frequent wildfires that naturally thinned trees, cleared out brush and generally helped rejuvenate the landscape.

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The use of prescribed fires, with proper management and range rehabilitation, has the ability to create, over time, a mosaic within the resource. A major part of Utah’s BLM ranges is dominated by a Pinion-Juniper monoculture. The use of fire and chaining, coupled with aggressive rangeland rehabilitation, can be used to create a mosaic on the landscape that is good for wildlife habitat, less vulnerable to large wildfires and plant disease, and ultimately is more productive for livestock grazing and rural economies.

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Cheat grass continues to be a growing problem on Utah’s BLM range lands. Its annual lifecycle provides an advantage over other native grasses. Cheat grass breaks dormancy early and matures quickly dropping seed and ultimately pushing out other plant species. This year, permittees have reported in Utah’s central ranges, the cheat grass began to ‘green up’ in January. Ultimately, as the cheat grass matures and dries, it is less palatable and creates major concerns for range land wildfires.

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BLM might consider changing the tradition grazing patterns in areas dominated by cheat grass. Allowing permittees to graze earlier those pastures dominated by cheat grass would allow better utilization by livestock while pro-actively addressing unwanted wildfires.

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Other issues that were not prominently addressed in the Draft EIS that should be part of the Final EIS include the following:

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1. BLM should consider how it will carry out its multiple use mandate during vegetative treatments. The proposal to increase the area of treatment has the potential to disrupt or displace existing uses, such as livestock grazing. Suspension of grazing permits for the 2-3 years required for range restoration work could result in cattle and sheep producers being forced out of business. Any proposals in the EIS that consider displacement of livestock grazing permits for any period of time must also consider ways to keep permittees in business during the time that their allotments are treated.

These could include:

- Providing alternative pastures for grazing during the time that a permittee's allotment is being treated.
- Using vacant allotments for alternative use.
- Using a permittee's livestock to control weeds or reduce fire loads in a nearby sector, or other creative ways to not reduce livestock grazing.
- Allowing shared grazing on allotments that are only meeting the permits minimum stocking rates.

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2. The EIS Should Address Coordination with Adjacent Landowners and Other Federal Agencies. Noxious and invasive weeds do not respect land ownership or land management boundaries. Responses to controlling or eradicating these harmful weeds should likewise know no boundaries. Coordination with adjacent landowners is essential if noxious and invasive plants are to be effectively controlled.

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Cooperation should also extend to other federal and state agencies. Utah's State and Institutional Lands Administration (SITLA) has interspersed state sections throughout the BLM. SITLA manages 3.4 million acres, mostly in conjunction with management of BLM rangelands.

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The National Invasive Species Management Plan concludes that coordination among government agencies at the federal, state and local levels is critical if we are to make headway in the battle against noxious and invasive weeds. Farm Bureau notes that private adjacent landowners must also become a key component of such coordination.

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The Animal and Plant Health Inspection Service (APHIS) has published for public comment a Draft Action Plan on Noxious Weeds. Like the BLM document, the APHIS draft does not mention coordination with BLM or other agencies in implementing its action plan. A BLM/APHIS cooperative program will be more effective in attacking invasive and noxious weeds on the federal lands. The BLM Vegetative Management EIS should develop a cooperative program that provides coordinated efforts that is factored into all of the proposed alternatives.

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Utah Farm Bureau Federation appreciates the opportunity to provide comments. We look forward to working with BLM to develop an effective and efficient vegetative management strategy.