

**Wichita County  
Noxious Weed Department**

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Brian Amme  
Vegetation EIS Project Manager, BLM  
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Dear Mr. Amme,

1

After having been an Assistant Noxious Weed Director for Wichita County, Kansas for 8 years and a director for 4 years, I feel qualified to comment on the proposed EIS Project being conducted by the BLM.

2

There are several new chemicals on the market that greatly enhance the arsenal of available methods of weed control. Many of these chemicals are much more environmentally friendly due to the lower application rates than some of the older chemicals when applied according to labeling. Many of these chemicals are also much more selective in the vegetation controlled, thus resulting in a lower rate of loss to desirable vegetation. All of these chemicals have been researched and approved by both the EPA and FIFRA, and are safe to the environment when applied according to labeling instructions.

3

I realize there are other means of vegetation control, e.g.: fire, biological, and mechanical methods. I do not feel an aggressive vegetation control program can use only one means for control of undesirable vegetation. As you know some vegetation such as Lodge Pole Pine, Redwood trees, and some desirable grasses require fire to allow the seeds to germinate. Not only does controlled burning reduce the fuel for wildfires, it can also enhance the vegetation in an area by allowing more desirable vegetation to flourish. Many of the species of thistle can be controlled by the timely use of mechanical control methods by preventing seed production (mowing Musk Thistle before heading)

4

I had a farmer here in Wichita County with a Musk Thistle infestation on 1/2 section of CRP. We had been working together for several years to gain control of this noxious weed. In the spring of 2005 I had him burn the grass off and apply 1 pint per acre of Picloram (Tordon 22K) and 1 pint of 2-4,D per acre following the burn. Throughout the summer and fall of 2005 there has been no Musk Thistle observed on this ground. There had been several chemicals applied to this ground over several years with control, but not eradication. I feel that the combined use of fire and chemical is what allowed us to eradicate this very aggressive noxious weed from this land.

5

There was another farmer here in Wichita County that had a total infestation of Field Bindweed on 31/2 sections of farm ground. He was attempting to use tillage to control this infestation, with much less than satisfactory results. This gentleman has since leased his ground to a very aggressive farmer that is conducting no-till operations. He is using several of the newer chemicals applied at different times of the year, as well as using competitive crop rotations with satisfactory results. Due to the prolific nature of Field Bindweed this is going to be a continuous battle, however the infestation is much lighter than it was just a few years ago, and this infestation has been controlled to the point it is no longer spreading to adjoining farm ground.

6

With my experience and training it is my opinion that Alternative B: Expand herbicide use and allow for use of new herbicides in 17 western states should be implemented by the BLM. Due to the terrain on much of the BLM lands I do not feel that Alternative D: Alternative B without aerial application of herbicides would be a viable alternative due to the inaccessibility by ground application equipment. I also feel that there should be clauses in the wording of this policy to allow the addition of new chemicals with proper labeling for the types of BLM lands as they become available without additional review. It is also my contention that methods other than chemicals should be implemented as necessary to protect the lands from infestations of undesirable species of weeds.

7

I strongly support Alternative B and strongly oppose all of the other alternatives with my strongest opposition to Alternative C: No use of herbicides, followed by Alternative E: No use of present or future AHAS inhibitor herbicide. I strongly believe the use of herbicides is mandatory, along with other control measures, to prevent the taking over of our public lands by undesirable plant species.

8

I also feel strongly that a plant species should not have to be made noxious on either the Federal, or a state's Noxious Weed List before control measures are taken. I feel that "Invasive Species" should be adequate to begin control measures. I also do not feel that vegetation labeled as "invasive" should have a blanket control policy as what could be determined to be "invasive" in one region could be determined to be a desirable in another region due to climate and growing conditions.

9

I also feel strongly that a non-native species should never have the distinction of ever being placed on a threatened or endangered species list. Here in Kansas there are 14 weeds listed on our state's Noxious Weed List. Only 2 are native to the United States. I realize this point isn't included in this EIS, however I feel it should be addressed at some point, and since this EIS is already being done, this may be a prudent time to look into some of these issues.

Thank you for your consideration in this matter. If you have further questions please feel free to contact me.

Doug Douglass