



# Malheur County Weed Control

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EMC0319

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Re: Public Comments on Proposed PEIS

Comments From; Malheur County Weed Advisory Board

1 Malheur County is the 8<sup>th</sup> largest county in the United States covering 9926 sq/mi, but it is also one of the sparsest in population. The proposed Programmatic Environmental Impact Statement (PEIS) is of particular interest to the citizens of Malheur County because approximately 80% of the land within Malheur County is managed by the 4th largest BLM district in the continental US. The Malheur County Weed Advisory Board are very committed to natural resource management that provides continued multiple use of public lands in a sustainable and equitable fashion. The intermountain west has been witnessing an ever increasing influx of visitors looking for a solitary experience. While this reality is good for the local economies, there are a number who are hesitant to say this is beneficial. Many of us are concerned that these visitors are bringing unwanted hitchhikers with them, namely invasive plants. To be sure, there have been non-indigenous plant species in some localized parts of this area for many years, however there are large areas that are relatively pristine and this is a definite attraction to visitors. 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 in the PEIS process could make the weed situation permanently irreversible. Malheur County has a long history with livestock production and that is still a major piece of the economy, however the influence of tourism as an economic force is growing rapidly. Malheur County and Eastern Oregon have many long established ranches and many are multi-generational operations. It is the intention of most of these owners that these legacies continue from this generation to the next and beyond. There is no question that it would be disastrous for this county if an agency charged with management of public lands were unable to manage invasive plants or animals in the best and safest possible manner. Given the scenario of majority federal ownership and constant source of new weed invasion it is easy to understand our concern about the ultimate shape of the PEIS.

2 It is our collective and measured opinion that the draft Vegetation EIS "Alternative B", the BLM preferred alternative is also our preferred choice. 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 arid fragile ecosystem of Malheur County. Malheur County Weed Advisory Board is not by any means advocating wholesale use of any and all herbicides on public land,

2 however we believe that an equitable solution can be achieved under “Alternative B”. This area is rapidly being invaded by several very aggressive non-indigenous plants. Many invasive plant management experts believe that at our current level of technology certain herbicides are the only viable option. 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 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.

3 There is an additional reason why this process is so important to Malheur County. Since 1984 all BLM districts in Oregon have been under a US Appeals Court injunction limiting them to the use of only four herbicides. These are all old chemistries with broad spectrum effects or non selective attributes. In the twenty or so years under the injunction many of the most troubling invasive species have multiplied unchecked on BLM lands within Malheur County. This fact has placed a huge financial burden on the many private landowners in the county who are trying to keep these invasive weeds at bay and who suffer the constant onslaught from huge plant populations on adjacent BLM land. Several of the worst weeds are not significantly controlled using the four herbicides approved for use in Oregon BLM districts. A well documented additional challenge, concerns the continual use of a single herbicide over multiple seasons which encourages resistant plant biotypes to survive and spread, further exacerbating the problem. More herbicide choices and using them in rotation or combination will diminish the chance that a resistant strain will survive. It is generally accepted that many of the new herbicide chemistries available, that Alternative B would sanction, are more environmentally friendly mainly because they are so species specific and because most are used in such minuscule rates per acre making them so much less persistent in the environment. If Alternative B is adopted, it is a first step in gaining a reversal of the court imposed herbicide injunction that has caused perhaps irreparable damage to the ecology, economy and wildlife habitat of Malheur County.

Respectfully Submitted;

Jerry Erstrom; Chairman, Malheur County Weed Advisory Board