wildidaho.org

Idaho Conservation League

PO Box 844, Boise, ID 83701 208.345.6933 Fax 208.344.0344

Brian Amme, Project Manager
Bureau of Land Management
PO Box 12000
Reno NV 89520-0006

See EMC-0641

February 10, 2006

Re: Idaho Conservation League comments on the Programmatic Environmental Impact Statement for vegetation treatments in the western United States

Dear Brian Amme,

Thank you for allowing us to comment on the PEIS for vegetation treatments in the western United States. The Idaho Conservation League has a long history of involvement with management of noxious weeds. As Idaho's largest statewide conservation organization, we represent members who have a deep personal interest in protecting public lands from noxious weed infestations and restoring native plant communities. We have attached our comments at the end of this letter.

We commend the Bureau of Land Management for adopting a region-wide program for the management of noxious weeds. Noxious weeds pose a serious threat to the ecological integrity of public lands, and we recognize the need to prevent or control their spread across the western U.S. However, we believe that the BLM should do more to address the root of the problem. While treatment is an important aspect of this project, the BLM should prioritize efforts to prevent the initial introduction, disturbance of soils, and vectors for the spread of weeds into the area. In particular, we believe that more should be done to address major causes of the spread of noxious weeds such as high road densities, overgrazing, soil disturbance from vegetation management, and irresponsible ORV use.

Additionally, although we support the judicious use of herbicides where safe and appropriate, we are concerned about potential adverse effects of aerial spraying on aquatic environments, particularly on small streams and other shallow water bodies. We do not feel confident that the proposed buffer zones will prevent contamination. We strongly encourage the BLM to consider adopting an alternative that strictly limits the use of aerial and broadcast application in regions containing water bodies.

Please continue to send our organization information on this project and feel free to contact me if you have any questions.

Sincerely,

John Robison

John Robison
Public Lands Director

Ketchum Field Office: PO Box 2671, Ketchum, ID 83340 208.726.7485 Fax 208.726.1821 Moscow Field Office: PO Box 9782, Moscow ID 83843 208.882.1010 Fax 208.882.7755

Idaho Conservation League comments on the Programmatic Environmental Impact Statement for Vegetation Treatments in the western United States

Purpose and Need for Action

We believe that the BLM should take a strong leadership role in the proactive management of noxious and invasive weeds. The most effective way to do so is to focus on prevention by aggressively addressing root causes of noxious weed dispersal. The PER itself states that "prevention and detection is the cheapest and most effective weed control method" (p. 2-16). Yet neither the PER nor the PEIS considers prevention as a treatment method. Rather, the documents focus exclusively on reactive methods such as herbicide application, fire use, mechanical and manual treatments, and biological controls. Simply treating current infestations of weeds does little to prevent future problems and ensures that the cycle of treatment and infestation will continue into the foreseeable future. The BLM needs to consider alternatives that more directly and more aggressively seek to reduce activities that contribute to the spread of noxious weeds such as roads, irresponsible ORV use, and grazing. Though we appreciate the BLM's duty to manage public lands for multiple uses including grazing, OHV use, and energy/mineral development, we believe the BLM can and should do much more to promote more responsible and less ecologically destructive use.

We recognize that the current EIS is broad in scope and provides basic information to local BLM offices to assist them with the development of more specific weed management programs. Nonetheless, we feel it is critical that the BLM address root causes of the spread of noxious weeds at the programmatic level and to direct local BLM agencies to do the same at the RMP and implementation levels. A focus on the prevention of noxious weed infestations via the aggressive management of primary vectors should be uniform to all BLM agencies and management plans.

Roads

There is a strong correlation between roads/vehicular traffic and noxious week infestations. According to numerous sources and studies, roads, trails, and their accompanying motorized users are primary conduits for noxious weed transport and establishment. In addition, a recent study shows that, contrary to popular belief, improved roads accelerate noxious weed expansion significantly more than primitive ones, while unroaded areas act as strongholds for native species against invasion[1]. We are particularly concerned with the practice of building temporary roads for logging activities, energy development, or for the construction of fence lines and pipelines, which have a tendency to become travel corridors and vectors for the spread of noxious weeds. We encourage the BLM to utilize existing transportation systems for project activities whenever possible.

The BLM needs to require the development of updated Travel Management Plans that incorporate aggressive strategies for the control of noxious weed infestations. Travel Plans should include a requirement for the establishment of a system that designates specific roads,

[1] Gelbard, J.L. and Belnap, J. Roads as Conduits for Exotic Plant Invasions in a Semiarid Landscape. *Conservation Biology 17*(2):420-432.

trails, areas, and time frames for motor vehicle use. Though the adoption of such a designation system may not be appropriate or feasible on a regional scale, on a local scale, it is a crucial part of a proactive, comprehensive noxious weed management program. We hope that the BLM will incorporate significantly stronger standards for travel plan compliance as part of both this ROD and the Travel Plan ROD.

Additionally, the PEIS should consider road decommissioning as an effective way of reducing noxious weed invasions and recovering native ecosystems. The PEIS should include a road density analysis, which identifies unclassified, high-risk, and low-use roads that could feasibly be decommissioned and obliterated.

ORVs

ORV's act as major vectors for the spread of noxious weeds both by carrying seeds of invasive species throughout BLM lands and by promoting the establishment of these species by disturbing soil. The BLM should coordinate with the Idaho State Department of the Interior, the Idaho Department of Parks and Recreation, and local Cooperative Weed Management Agencies regarding options for the prevention and control of illegal and irresponsible ORV use. The EIS needs to include an analysis of the contribution of cross-country ORV use to the spread of noxious weeds. Managers should recognize which species of noxious weeds are spread by ORVs and which species take advantage of ORV-disturbed trails.

The BLM should strictly enforce ORV regulations and initiate an aggressive campaign encouraging responsible use. As part of this decision, the BLM should encourage ORV users to clean off their vehicles at car washes before and after use. Signs identifying noxious weeds should be posted at the trailheads. The BLM should work with ORV clubs on a noxious weed control program in which club members hand pull weeds before they seed, similar to the "Adopt a Highway" program.

Grazing

Livestock are significant vectors of noxious weed. Livestock can transport weed seeds in their hooves and hides as well as in their digestive tract. In addition, overgrazed areas are significantly more susceptible to noxious weed invasion. The EIS fails to recognize the relationship between livestock grazing and the spread of noxious weeds, and the alternatives provided include no measures to control and prevent infestations related to grazing activities. The issue of grazing is particularly significant to this PEIS as the majority of proposed treatments would occur in Nevada, Idaho, Oregon, and Wyoming, four grazing intensive states.

The BLM needs to assess the role that overgrazing has played in noxious weed expansion and assess different management strategies to reduce this threat. Specifically, the BLM should analyze how changing the frequency and intensity of grazing will affect noxious weed spread and native species restoration. We recommend that the BLM follow the lead of the Forest Service's Pacific Northwest Region which adopted a standard that uses "available administrative mechanisms to incorporate invasive plant prevention practices into rangeland management[2]."

---

[2] USDA Forest Service, Pacific Northwest Region. (2005). *Pacific Northwest Region Invasive Plant Program, Final Environmental Impact Statement, Record of Decision*, p. 16

The mechanisms to be utilized include the revision of permits and allotment management plans and annual operating instructions.

Grazing as a Biological Control

Though we support the use of grazing as a biological control under certain conditions, the BLM should utilize this type of treatment very cautiously as grazing activities can contribute to the spread of noxious weeds and can be incredibly detrimental to ecosystem health. The PEIS needs to consider the cumulative impacts of grazing and associated management activities on native vegetation, water quality, soil conservation, and ecosystem integrity. Grazing on wetlands and in riparian areas should be minimal, and the BLM needs to establish appropriate buffer zones to protect streams from sedimentation and to maintain riparian ecosystem integrity. In addition, we feel that the proposed use of livestock for 60% of biological treatments is excessive. The BLM should consider alternatives that rely less on livestock and more on other biological controls in combination with other types of treatment and prevention techniques.

The BLM must carefully consider a variety of factors when deciding how, where, and when to utilize grazing as a biological control including the species of livestock to be used, season, and intensity and duration of grazing, all of which significantly impact the effectiveness of livestock grazing at controlling noxious weed infestations. Additionally, steps must be taken to ensure that livestock do not unintentionally spread weed seeds. One method of minimizing such spread is to avoid grazing during flowering and seeding stages. Livestock should also be allowed ample time to pass all seeds through their digestive systems before being released into uninfested areas.[3]

Fire Use

We support the careful use of fire to manage noxious weed infestations so long as it is used to reestablish historic fire regimes and it is accompanied by the replanting of native vegetation. Disturbance from fire can serve as a vector for the spread of certain noxious weeds. The use of fire thus also needs to be accompanied by a strict monitoring program designed to ensure the rapid detection and containment of noxious and invasive weed species in order to ensure re-infestation.

Mechanical Treatment

We generally support the use of mechanical treatments, but encourage the BLM to utilize these treatments thoughtfully. The timing and duration of mechanical treatments will be crucial to their success. For instance, some treatments may need to occur annually for a period of several years in order to prevent the re-infestation of certain noxious weed species. Mechanical treatments in Wilderness Study Areas will be more controversial and prevention should be emphasized in these locations.

Herbicide Application

Because of the serious ecological damage caused by noxious weeds, we support the judicious use of herbicides when careful analysis demonstrates its appropriateness on a site-specific basis. However, the environmental costs of herbicide use must always be carefully weighed against the

---

[3] Frost, R. A. and Launchbaugh, K. L. Prescription Grazing for Rangeland Weed Management: A New Look at an Old Tool. *Rangelands 25*(6):43-47.

benefits in light of alternative methods of noxious weed control and prevention. The burden rests on the BLM to demonstrate, via analyses of the characteristics of specific herbicides as well as site conditions and weather patterns, that proposed herbicide application treatments will not adversely impact non-target species or overall ecosystem integrity. Non-herbicide treatments and prevention techniques should be utilized in situations where herbicide application may result in unintended harm.

We have serious concerns about the adverse impacts of aerial herbicide application on aquatic environments, particularly over smaller streams and intermittent channels. We do not believe that the minimum 100-foot buffer zones between water bodies are adequately protective. Furthermore, we feel unsure about how the BLM might prevent contamination to streams via wind drift, even with buffer zones, particularly since the elevation of spraying will vary. Although we recognize that aerial and broadcast applications may be appropriate in some areas, we strongly encourage the BLM to consider adopting an alternative that does not involve using aerial applications in regions containing wetlands or small streams and other shallow water bodies. The BLM should also refrain from utilizing aerial applications in regions containing critical habitat for threatened and endangered fish species. Amphibians are also extremely sensitive to herbicides, even at relatively low levels. The PEIS needs to analyze potential impacts to amphibians and associated species from the use of these herbicides.