



STATE OF IDAHO

DIRK KEMPTHORNE
Governor
PATRICK A. TAKASUGI
Director

DEPARTMENT OF AGRICULTURE DIVISION OF ANIMAL INDUSTRIES

2270 Old Penitentiary Rd.
P.O. Box 7249
Boise, Idaho 83707

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(208) 332-8540
www.idahoag.us

Bureau of Land Management
Nevada State Office
Attn: Brian Amme, EIS Project Manager
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme,

The Idaho State Department of Agriculture (ISDA) appreciates this opportunity to comment on the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS). Conducting this comprehensive analysis of the herbicides available to the Bureau of Land Management (BLM) will ensure the continued sustainability and improvement of public rangelands. In order to more effectively implement the policies put forth in the PEIS, ISDA offers the following comments.

1

ALTERNATIVES

Alternative E

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ISDA suggests that Alternative E, which would prohibit the use of sulfonylurea and other acetolactate synthases-inhibiting active ingredients, would severely limit the effectiveness to manage invasive species and should be removed from consideration.

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Additionally, in its current form this alternative falls outside the scope of analysis of the PEIS. The stated "Scope of Analysis" of the PEIS "...is to provide an analysis of the expected increased use of herbicides related to implementing mandates to reduce hazardous fuels and manage and control vegetation affecting other resources" and "...does not address...the effects of livestock grazing on vegetation." (pg. 1-4). The PEIS, however, does address the effects of livestock grazing on vegetation under the description of Alternative E. The PEIS states:

This alternative would place greater emphasis on passive restoration, by prohibiting or restricting activities such as livestock grazing, OHV use, logging, or oil and gas development in areas where these activities have

promoted a less desirable vegetation community, or increased erosion.
(pgs. 2-13 – 2-14)

4 The PEIS again addresses livestock effects on vegetation under this alternative on page 4-216, “By reducing the number of livestock entering degraded areas, improvement in ecosystem health can be expected.” If this PEIS is not to address the impacts to livestock grazing as it says, then Alternative E is not within the scope of analysis and should not be considered by the decision-maker.

Alternative B

5 Though ISDA does support the preferred alternative, Alternative B, we have some general concerns with what it proposes. BLM is proposing to treat over three times as many acres it is currently treating with herbicides. ISDA congratulates BLM for taking this aggressive approach to vegetation management. However, ISDA is also aware of decreasing budgets that the BLM has had to deal with over the past several years, particularly for weed management. BLM field offices, at least in Idaho, have had to increasingly rely on cooperative ventures (i.e. CWMA) and grant money to supplement weed treatment budgets and meet target acres. This raises the questions, is the proposed amount of acres to be treated under Alternative B fiscally feasible? Will money have to be diverted from other important programs in order to effectively treat targeted acres? ISDA believes that these are valid questions that must be addressed in the PEIS.

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General Comment

7 On page 2-33 under the summary of cumulative effects on livestock the PEIS states, “Treatments would restore native vegetation favored by livestock and make rangelands more resilient to disturbance.” ISDA suggests that this sentence be changed to read, “Treatments would restore native *and desirable non-native* vegetation favored by livestock and make rangelands more resilient to disturbance.” We also ask that any similar phrasing in the PEIS be changed to read the same. The objective should be to establish desirable vegetative communities that will stabilize soils, resist invasive species, as well as meet multiple-use objectives (livestock, wildlife, watershed values). Native plant communities are certainly the most desirable but we cannot discount the value of certain non-native species in meeting these objectives.

STANDARD OPERATING PROCEDURES (SOPS)

8 Under the “General” guidelines of Table 2-6 on page 2-17, Standard Operating Procedures for Applying Herbicides, the seventh bulleted item states, “Have licensed applicator apply herbicides.” This guideline is more stringent than Idaho state law requires and may be more stringent than other states as well. For example, members of a seasonal weed crew that apply general use herbicides are not required to obtain an applicators license in Idaho as long as they are directly supervised by a licensed applicator. Following appropriate state laws is adequate and will significantly lessen the burden of supervisors trying to find qualified applicants as well as decrease program

costs. ISDA suggests that this bulleted item be changed to read: "Follow respective state laws regarding herbicide application licenses."

MONITORING

ISDA is pleased to see BLM address monitoring and the adaptive nature of vegetation management. We are, however, concerned with how BLM is going to monitor and follow-up herbicide treatments. On page 2-21 the PEIS states,

The BLM recognizes that many sites treated in the past lack monitoring data. In many cases monitoring was not done, was done sporadically without consistent documentation, or was done but the records were lost or destroyed.

The PEIS then goes on to say that to correct these problems "...monitoring must be designed to determine if the treatment was effective...and to ensure that the treatment did not adversely impact other resources."

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We have two concerns with these statements. One, this statement is extremely ambiguous and does not offer any real solutions. To what degree is effectiveness to be monitored and impacts to be investigated? Two, how is BLM going to expect personnel to monitor three times the amount of vegetation treatments when resources are insufficient to monitor what they currently treat? ISDA suggests the BLM, in the PEIS, describe the components of an effective monitoring program (including identification of parameters for developing tangible objectives), or at least, require weed program supervisors to be trained in how to carry out an effective monitoring program. If BLM wants to make a change in the effectiveness of its monitoring, it must begin in the PEIS.

ISDA encourages selection of the preferred alternative, Alternative B, with consideration of the concerns and comments identified above. We are excited to see BLM being aggressive in their vegetation management and herbicide program. We are particularly please to see the BLM approve four new herbicides which will give managers greater flexibility in how they manage rangelands.

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Sincerely,



Ken Crane
Range Program Manager
ISDA