

**BOARD OF COMMISSIONERS
CUSTER COUNTY, IDAHO
P.O. BOX 385 – CHALLIS, IDAHO 83226**

(208) 879-2360

Monday, January 09, 2006

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

Dear EIS Project Manager,

- 1 On behalf of the citizens in Custer County, our Noxious Weed Department and the Custer County Coordinated Weed Management Area committee, we would like to submit the following comments on the BLM Draft *Vegetation Treatments Using Herbicides Programmatic EIS*. Ninety-six percent (96 %) of the 3.15 M acres of land in Custer County federally or state owned. Weed control comprises an integral part of our budget and control of noxious/invasive species by ALL landowners in the county is an important topic to us.
- 2 We would initiate our comments by supporting the "Preferred Alternative:" Alternative B; which expands herbicide use and allows for use of new herbicides in the 17 western states and strongly oppose all other alternatives. Further we are in support of the continued responsible use of established reliable herbicides and the addition of newer, scientifically advanced chemistries that have been developed or are yet to be developed for addressing vegetation treatment on BLM lands.
- 3 Our concerns and therefore our support for the Preferred Alternative lie in the fact that the other alternatives severely limit BLM's vegetation management tools. If herbicide use and application methods are limited, BLM land will continue to degrade. Tying BLM's hands makes for a poor neighbor and hinders our efforts on surrounding lands-be they public or private.
- 4 We also support the "Protocol for Identifying, Evaluating and Using New Herbicides" to facilitate evaluation and addition of new chemicals as they become available in the future. The process still seems slow at two years-best case scenario, but is much better than what appeared to be "no process" before. We offer as an example the use of Plateau® (imazapic) on BLM lands. The chemical has been on the market for at least

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cont.

five years, has a proven record of being very effective on leafy spurge (*Euphorbia esula*) one of our major noxious weeds of concern. In addition, Plateau® offers less environmental issues, is less expensive to use when compared to other recommended chemicals and opens an additional window of opportunity for control and yet it could not be used because it was not on the approved list!

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While it appears that with approval of the Preferred Alternative, the BLM will be able to use Plateau® and other new chemicals that have been developed since this issue was last addressed in 1991, we would encourage the addition of one more chemical to the list. The chemical is Milestone® (aminopyralid) manufactured by Dow AgroSciences LLC. It's effectiveness in controlling spotted knapweed (*Centaurea maculosa*); our other noxious weed of major concern, exceeds that of other recommended chemicals and is environmental safe. If it cannot be added to the current PEIS we would encourage you to start the "Protocol for Identifying, Evaluating and Using New Herbicides" immediately.

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Along with support of the above protocol, it follows that the EPA approval of herbicides under the FIFRA registration process is also a must. The EPA has looked at all the environmental concerns including Human Health Risk Assessments (HHRA) and Environmental Risk Assessments (HER) and there should be no need for BLM to go through the same process and expense again. Ideally it would seem that once a new chemical has gone through the rigorous FIFRA registration process, its approval by the BLM, or any government agency for that matter, would be automatic.

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Also as a point of clarification, once a new active ingredient has gone through the BLM Herbicide Evaluation Protocol and a Supplemental EIS and Record of Decision is issued additional NEPA processes should not be required at the local level in order to use the herbicide on public lands. For example, when the Preferred Alternative for this EIS is chosen and the use of Imazapic is permitted, all the Field Offices in the Western United States should not be required to write additional NEPA documents to use it.

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In summary, we are in favor of the Preferred Alternative and totally opposed to any of the other alternatives proposed. BLM need to have all the tools and methods of control of invasive/noxious weeds available to them. Weeds are an "across the board" problem to all users of our public lands (recreation, grazing, timber and mining) and need to be fought with everything in our tool chest rather than hamper efforts with limited tools and methods.

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We thank you for the opportunity to comment. We also reserve the right to offer further comments as new information becomes available.

Sincerely,



Lin Hintze, Chairman
Custer County Commissioners