



Kittitas County Noxious Weed Control Board

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RE: Draft EIS Comments

- 1 The mission of the Kittitas County Noxious Weed Control Board is "...to protect and preserve the agricultural, recreational, wildlife habitat, and natural areas of the Kittitas County from the degrading impact of exotic and invasive noxious weeds..." The BLM also has a similar responsibility and as a good land steward needs to address this responsibility in the most beneficial and cost effective means possible.
- 2 Noxious weeds cannot be adequately controlled unless federal, state, county, and private interests work together in controlling weeds using effective and efficient means (Lacey and Fay, 1984). The benefit from noxious weed control on BLM managed land is not only the prevention of economic losses on their lands, but also the prevention of economic losses on neighboring lands, specifically private land. If the BLM truly wishes to "manage" their lands in a way that provides the most benefit to society, then Alternative B is the obvious, preferred choice.
- 3 Alternative B is an expansion of the existing Integrated Pest Management (IPM) program that BLM currently follows and does the one thing that all other proposed alternatives does not—make the program better. It is a flexible alternative, not restrictive, and would allow implementation of the most effective and economical treatment method available on each individual site. All vegetation treatment methods would be considered and a method would be selected based on expected positive and negative effects. We believe that is the definition of IPM and if you eliminate or restrict a control method, as you would be doing in three of the proposed alternatives (C,D,& E), then you are not implementing a good program and would not be conforming to land use plan objectives and budget capabilities on public lands. Managerial ability to select the most appropriate and cost effective treatment method for all situations would be reduced under Alternatives C,D, and E.
- 4 When you get right down to it, Alternative B would allow for the needed treatment of more acres than the current EIS, that's a positive impact. All other alternatives would result in fewer acres being treated, that's a negative impact.

5 It is the opinion of this board that if BLM wishes to choose an alternative that will have a positive impact; an alternative that will help achieve desired vegetation communities, reduce populations and spread of noxious weeds, reduce hazardous fuel buildup, and many other beneficial impacts, then it will choose to implement Alternative B. If it wishes to choose an alternative that will have a negative impact; an alternative that will limit control methods and result in less acres being treated, regardless of method, then it should choose any other alternative and allow BLM lands to degrade.

6 Here in Kittitas County, we have seen the results of restrictive and limiting EIS's. The Cle Elum and Naches Ranger Districts that manage the Wenatchee and Snoqualmie National Forests have implemented similar EIS's as proposed by BLM in Alternatives C,D,& E and the results have been what we expected—less noxious weeds being controlled and more lands being infested. Noxious weed control on United States Forest Service owned lands in Kittitas County has gone down hill, not up, and their hands are tied due to the restrictive and limiting EIS. Please do not allow the BLM to walk down this same path; it is both frustrating and harmful to those who work for the agency, as well as those who work cooperatively with the agency, like this board. Make the right choice, choose Alternative B.

Sincerely,

Kittitas County Noxious Weed Control Board