

# CAMAS CREEK COOPERATIVE



## WEED MANAGEMENT AREA

Camas County Weed Superintendent

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To : Brian Amme, Project Manager, BLM  
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See FL-0004

From: Terry S. Lee Camas County Weed Superintendent  
Administrator Camas Creek Co-Operative Weed Management Area  
P.O. Box 130 Fairfield, Idaho 83327

Comments for Draft Vegetation Treatments Using Herbicides on the Bureau of Land Management (BLM) lands in 17 Western States. Programmatic Environmental Impact Statement.

By properly using the most effective herbicides available for specific vegetation applications, we stand a better chance of controlling not only new invaders, but also established infestations of noxious weeds.

### **Alternative A No Action Alternative**

By choosing the NO Action Alternative and not implementing the proper tools needed for Hazardous fuel reduction, Rangeland Rehabilitation and noxious weed control we will see a continuous degradation of not only BLM but private lands as well. I do not support Alternative A.

### **Alternative B Expand Herbicide Use and Allow for Use of New Herbicides**

Using the newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied for control of numerous weed species. The product imazapic will result in more resilient plant communities not in need of annual herbicide treatments. Addition of the two new aquatic products will allow rapid response to any aquatic weed problems.

Loss of old herbicide chemistry such as 2,4DP, asulam, atrazine, fosamine, melfluidide and simazine is acceptable.

I strongly support the approval of Alternative B.

### **Alternative C No use of Herbicides**

In Camas County we have been working with Bio-control agents for several years. Although, Bio-control is a form of noxious weed control it is proven that Bio-control agents work well with other forms of weed control and especially herbicide applications, but are not as effective as a stand-alone control method. Bio-control is a long drawn out

process, and takes numerous years before you see any true results. I believe that we should all use every tool in the toolbox available and only then will we have a fighting chance to win the war on weeds.

Idaho has come a long way in forming cooperative agreements with State, Federal, and Local Government agencies along with the private sector. We have had great success in controlling noxious weeds because we have been able to use all methods of weed control available.

I do not support Alternative C.

#### **Alternative D No Aerial Applications**

With today's technology for improved aerial spray techniques (including booms, nozzles, GIS capability), aerial application of herbicides is more targeted, more efficient, creates less impacts/drift, and can be more effective than ground applications. "Greater Drift" impact is minimized by use of selective herbicides and new application technology. Because of many variables of terrain on BLM lands vegetation treatments can only be effectively treated by aerial applications. Use of ground application equipment can result in skips and overlaps resulting in damage to off target species. The EIS correctly outlines how aerial applications are more cost effective than ground applications. Specifically written bid specifications can help to avoid off target damage, by assuring best aerial application technology and applicators with reputations for accurate applications.

#### **Alternative E No Use of Acetolactate Synthase-inhibiting Herbicides Emphasis on passive restoration:**

It is good practice to base vegetation management decisions on priorities, goals, scientifically proven methods and put emphases on prevention. However the actions called for in this section will delay treatment due to lack of time, materials, personnel and funding. This section also has many points of contradiction in relation to the use of ALS herbicides, restoration with native vegetation, using best available science and using limited disturbance management practices. This alternative has several facts wrong and misses the mark on altering fire behavior. The section of greatest concern is banning use of ALS herbicides.

I strongly appose Alternative E (Management outlined in Appendix G)

#### **Appendix D Protocol For Identifying Evaluating, and Using New Herbicides**

Overall I support this process with one change needed.

*"Determining the Need for New Herbicides"* requires an additional valid reason for considering approval of a new active ingredient of *"to expand availability of the number of substitute products to avoid resistance"*. It is understood this could be covered under *"but are not limited to:"*

#### **Not Covered / Addition to Final EIS Needed**

PEIS is in need of a section addressing Early Detection Rapid Response (EDRR). In Appendix D the process to secure a new herbicide is 2+ years. This is unacceptable for EDRR. There MUST be an approved procedure for EDRR in regard to herbicide use.

PEIS is in need of a section addressing development of sustainable fuel breaks in the brush/grasslands in an effort to return wildfires to historical size as well as protect property, critical habitat areas and newly revegetated or rehabilitated sites. Suppression should be a last resort, prevention as fuel breaks and proactive fuel management as vegetation treatments should be a first priority.

Respectively submitted,

Handwritten signature of Terry S. Lee in cursive script.

Terry S. Lee Camas County Weed Superintendent

Handwritten signature of Ron Chapman in cursive script.

Ron Chapman Camas County Commissioner Chairperson