



# FRANKLIN COUNTY

## NOXIOUS WEED CONTROL BOARD

COURTHOUSE - 1016 NORTH 4<sup>TH</sup>  
PASCO, WASHINGTON 99301  
Phone (509) 545-3847 Fax (509) 545-2139

January 6, 2006

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

See FL-0003

Dear Mr. Amme:

I am writing to comment on the BLM's "*Vegetation Treatments Using Herbicides Programmatic Environmental Impact Statement*" and on the "*Vegetation Treatments on BLM Lands Programmatic Environmental Report*." These comments are made on behalf of the Washington State Noxious Weed Control Board, which is the noxious weed policy-making body for Washington State.

We support the Preferred Alternative, Alternative B, as outlined in the *Programmatic Environmental Impact Statement*.

With invasive vegetation and noxious weeds already being the dominant vegetation on an estimated 35 million acres of public lands, it is clear that Alternative A, continuing current practices, is unacceptable. Those are the practices that led to this high level of established invaders.

Alternative C, no use of herbicides, would speed the rate at which noxious weeds take over our public resources and endanger the communities, wildlife and recreation that depend on them.

Alternatives D and E also unnecessarily limit the control tools available to BLM's on-the-ground managers, who best know local site conditions. Herbicides approved under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) are applied specifically to produce beneficial net results and are among the most regulated substances on earth. Managers who are trying to protect and restore our public lands and resources should not have fewer tools available to them than their counterparts on private lands.

We also support the protocol for identifying, evaluating and using new herbicides. It is possible that science and industry in the near future will produce herbicidal tools that are safer and more effective than those available today. Any public policy that does not provide a mechanism for such tools to be evaluated and used if found to be beneficial has obsolescence built into it.

The Board supports the principles of Integrated Pest Management, as outlined in Chapter 17.15 of the Revised Code of Washington. Treatments under an IPM program may include biological, cultural, mechanical and chemical control methods.

Thank you for the opportunity to comment on these important documents. Please do not hesitate to contact me if I can provide additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. H. Frederickson".

W. H. Frederickson  
Coordinator