

Dear Mr. Amme,

1 Greetings, my name is Bryan Dallolio, and I am the treasurer secretary of the South West Idaho Weed Control Association, a non- profit association, composed of representatives of the ten counties, found in the southwest corner of Idaho. In general we are persons that work for their respective county governments. We are responsible for upholding the Idaho state noxious weed law, and we try to control noxious weeds on both private, and public ground. In all cases, we strive to operate environmentally sound, integrated management programs that include biological control programs. However, in all 10 counties, we have weed problems that are not controllable without the use of herbicides.

2 We understand that there is to be a determination of how the Bureau of Land Management will manage the vegetation in the 17 western states.

3 On behalf of the South West Idaho Weed Control Association, we would like submit the following comments and opinions about the use of herbicides on public grounds administered by the Bureau of Land Management.

4 We support the developed “Protocol for Identifying, Evaluating and Using New Herbicides.”

5 We support “Preferred Alternative B”. That allows for the continued and expanded use of herbicides in the 17 western states.

6 We strongly oppose all choices limiting or reducing the use of herbicides on public ground.

7 There are two testimonials in support of herbicide use that we would like to submit:

8 On behalf of the Gem County Noxious Weed Control, as submitted to the South West Idaho Weed Control Association:

9 Gem County Weed Control has a contract to do up to \$5000.00 of noxious weed control on 71884 acres of BLM land in Gem County, Idaho.

- Ten acres of Poison Hemlock was removed from Squaw Creek using Escort and Weedar 64, near Black Canyon Res., preventing their seeds from spreading downstream into the irrigation system.
- Four small patches of Hoary Cress were successfully eradicated on Johnson Creek using Escort.
- Two patches of Russian Knapweed found on Squaw Butte, have been eradicated after three years of treatment with Curtail. Two other patches are on the second year and will soon be gone with further treatment.
- The Lower Gem Cooperative Management Area has treated Scotch Thistle on BLM land with Telar, Banvel, and 2, 4-D with great results.

- The Upper Payette Cooperative Weed Management Area has treated Dalmatian Toadflax on BLM land with a Tordon/Telar mix with very good results.

11 All stated examples need ongoing monitoring and re-treatments if necessary. All sites are in rugged terrain and require the use of 100 yards of handgun hose, ATV spray rigs, and backpack sprayers to treat. If not treated, these weeds would continue to spread across BLM land to private properties, putting the burden of stopping an invasion on private landowners.

12 We spend little time and effort on our most plentiful noxious weed - Rush Skeletonweed. Our funds would soon run out herbicide and we would gain little. As we wait for bio-control agents to bring this weed under control, it continues to spread. One private landowner hired an airplane spray service to apply Tordon by air to his border with BLM to stop Rush Skeletonweed from invading his ranch. He got excellent results, but will need to keep an active spray program to continue to protect his property - at his own expense. If these other weeds were not controlled under a rapid response effort with herbicides, they would soon become widespread to where we lose the ability to control them.

Jake Wyant
Gem County Weed Superintendent
125 E. Dion St.
Emmett, Idaho 83617

Additionally, submitted by the Elmore County Weed Control:

January 11, 2006

To: Bureau of Land Management
From: Elmore County Weed Control
Subject: EIS, Concern of chemical usage for weed control

Concerning the use of chemicals on noxious weeds on public lands:

13 Due to the heavy use of roads on public lands often that is where we see the beginning of noxious weed infestations. When not treated these infestations create seed beds that are then carried farther into remote public lands areas where they continue to spread often unseen or unnoticed until the infestation has become a large problem. One of the many positive aspects of public lands is the presence of wildlife that needs native forage to survive. As invaders, noxious weeds often replace native forage thus causing wildlife to move out of their normal range to search for acceptable forage. Left untreated noxious weeds can quickly replace acres of native ground with unsightly, unusable plant colonies. These colonies can continue to spread with wind, rain, and other means of transportation such as recreational vehicles, hikers, animals and birds. Noxious weeds by nature are capable of sustaining life due to strong tap roots or intense root systems that cannot

readily be overcome with mechanical or bio control. Chemical control can kill roots systems on young or existing weeds before they can produce seeds or other rhizomes. As stated above noxious weeds are also brought onto public lands by human or animal hosts and are often found on campsites, trails, creek beds and other areas. If located and treated in a timely manner, such as chemical use can provide, this can eradicate infestations that can hinder or ruin the productivity of native ground. I am in favor of chemical control of noxious weeds and feel it is a very useful tool in overall land management.

Stacie Prow
Elmore County Weed Control
150 S 4th E #1
Mountain Home ID 83647

Thank you for considering our comments on this matter.
Sincerely,

Bryan Dallolio
Treasurer/Secretary, SWIWCA