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Noxious weeds are arguably the most significant threat to our natural resources. Without proper management, there is a high probability that noxious weeds will advance to dominate hundreds of thousands of acres of our public land. The control of noxious weeds aids in preserving and/or restoring wildlife habitat, watershed health, and recreation opportunities. Few noxious weeds are palatable to wildlife; controlling noxious weed infestations and restoring the areas to native grass and forb communities enhance habitat and help to maintain healthy wildlife populations. Healthy wildlife populations help to increase recreational activities such as hunting and wildlife viewing, thereby stimulating the economies of local communities. Noxious weeds are also a threat to watershed health in that they: displace native plants, reduce biodiversity, alter normal ecological processes, and increase soil erosion and stream sedimentation. Control of noxious weeds is instrumental in preserving watershed health. To effectively battle these exotic, invasive species, knowledgeable individuals must be outfitted with adequate tools. These tools include: a host of safe, effective herbicides including ALS inhibiting chemicals, timely access to new or improved herbicides, as well as aerial application in some areas.

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

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The present policy fails to provide all of the tools that are now available. Maintaining the status quo fails to address our problem as evidenced by the continuing encroachment of noxious weed infestations onto our public lands. We must invoke new strategies and take advantage of new technologies as they become available, provided they are proven safe and effective, if we are to make progress in our war on weeds. Tri-County CWMA does not support Alternative A.

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

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Under this alternative, a larger number of acres would initially be treated using herbicides; this is a much-needed step in our battle and would aid in decreasing the number of treated acres over time. Limiting treatment only serves to facilitate increased infestation rates by allowing some quantity of weeds to escape treatment. The loss of six seldom used herbicides, in this alternative, is overcome by the addition of four effective herbicides. We should take full advantage of the advances being made in herbicide chemistry and effectiveness if we are to gain the upper hand against noxious weeds. I strongly support the approval of Alternative B.

### **Alternative C- No Use of Herbicides**

4 Although herbicides are but one tool in the integrated vegetation management toolbox, they are quite significant given their abilities to slow infestation rates and allow biological, mechanical, cultural, and restoration efforts the time to gain a foothold against tenacious, invasive weeds. At this time, biological controls are available for a limited number of noxious weed species, and their effectiveness varies from very good to poor, depending on the agent species as well as the weed species and many environmental factors. Mechanical and/or cultural control methods may be effective on some weed species, but may actually increase the infestation of a large number of noxious weed species, particularly those that can reproduce from root or stem fragments. The disturbance associated with cultivation and/or prescribed fire may serve to provide an open niche with limited competition for many noxious weed invaders. There is no substitute for safe, effective herbicide application in the battle against invasive weeds. I do not support Alternative C.

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

5 The Tri-County CWMA uses every means of herbicide application at our disposal. This includes backpack sprayers, boat mounted sprayers, ATV sprayers, and horseback sprayers. Even with these application methods, there are some areas within our jurisdiction that cannot be effectively reached without the use of aircraft. Steep rugged canyonlands pose a formidable barrier to most ground based application methods. Although, noxious weeds do not seem to face the same challenge negotiating these obstacles as humans do. With today's technology, aerial herbicide application is not only safer and more effective than ground based application in these areas, it is also much more cost efficient. Improved drift control agents and improved nozzle technology have significantly reduced the risk of off target application by increasing droplet size. I do not support Alternative D.

### **Alternative E- No Use of Acetolactate Synthase Inhibiting Herbicides**

6 Sulfonylurea herbicides are the only truly effective form of control with regard to some noxious weeds, particularly whitetop (*Cardaria draba*) and perennial pepperweed (*Lepidium latifolium*). Thousands of acres of the Vale District of BLM in Oregon are currently infested with these species. The infestations are spilling over from public to private land. It would be a detriment to weed control efforts in this part of the country to prohibit the use of the only effective herbicides for these species. I do not support Alternative E.

Thank you,  
Greg Winans  
Tri-County CWMA Director