



# ADA COUNTY NOXIOUS WEED

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BRIAN WILBUR  
Director

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February 6, 2006

To: Brian Amme, Project Manager, BLM  
P.O. Box 12000  
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From: Brian K. Wilbur, Director  
Lyle Larkin, Field Operation Manger  
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EMC0510

Subject: Comments on Draft Vegetation Treatments Using Herbicides on BLM lands in 17 Western States.  
Programmatic Environmental Impact Statement

1

Ada County Weed & Pest Control is of the opinion that the BLM needs to retain the use of chemicals in the vegetation management program on its lands. We are not advocating chemicals as the only tool, but it needs to be included as a choice in an integrated weed management program. By allowing BLM employees more choices, they can better manage the lands under their control.

see FL0004

#### Alternative A No Action

Currently BLM lands are degrading at an accelerated rate, with good management principles being employed, if no action is taken against the continued invasion of non-native and noxious weeds the degradation will not only continue but the costs to reverse this alternative will be exponentially higher. We can't afford the cost. Adjacent property owners would bear an increased financial burden from the migration of weeds and seed off BLM lands similar to the action created with the moratorium against pesticide use in the eighties. During the late eighties we watched as Rush Skeletonweed spread across the public lands. The moratorium rendered control authorities powerless to prevent the invasion and did more to advance the spread and establishment of noxious weeds than any other activity I know of. We strongly request the removal of Alternative A as an option.

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

The citizens of Ada County use our foothills, Public Lands, as our backyard. Public land provides many kinds of diverse recreation for the people living in Ada County. I believe the citizens of this County support the rehabilitation of the Public Lands. This EIS is clearly a battle, not to decide if we should rehabilitate the land but on how we approach the rehabilitation. The historical evidence is resonant of the fact that the options of No Action and No Use of Herbicides will be detrimental against the invasion of noxious weeds. Both options have already been tried. We support Alternative B because noxious weed infestations on Public Lands are too large for the Federal Government to control with the money they presently budget. In the noxious weed battle it is essential that we maximize both the funding and the control options. Alternative B allows land managers more choices and the best results for the dollars spent. By allowing the incorporation of new herbicides, and providing quicker approval to the usage list, we can maximize the Early Detection Rapid Response (EDRR) using an integrated weed management approach. This EDRR approach will provide a higher level of protection for the uninfested lands, while using the least amount of pesticide against new invaders. Alternative B will allow the most rapid and economical rehabilitation for infested lands. We strongly support the approval of Alternative B.

#### Alternative C No Use Of Herbicides

Deep-rooted perennial weeds cannot be controlled without the use of the proper herbicide, at the proper timing. The BLM is already stretching its manpower to thinly, to regress to mechanical as its primary control method for invasive vegetation. There are just too many acres, and not enough manpower, to mow or pull the undesirable vegetation. At Ada County weed control department we have been able to work with many government agencies where we have combined herbicides with replanting or releasing desirable vegetation. In addition to chemical applications our department is very active in the distribution of biological agents that help control noxious weeds. This integrated weed management approach works very well. Alternative C will do nothing but take away management tools that are badly needed. To believe we can manually control noxious weeds on all public lands would be foolish and irresponsible. Organisms that provide biological control have many factors that limit their survival. This will leave large areas with no means of control and open to invasion by noxious weeds and undesirable vegetation. This alternative does not support an integrated weed management approach. We cannot support it. We strongly request the removal of Alternative C as an option.

#### Alternative D No Aerial Applications

With today's technology for improved aerial spray techniques (including booms, nozzles, and GPS capabilities), aerial spraying can be highly target oriented. Large tracts of land can be quickly covered. Many other tracts are rough and manual or ground application equipment can not access it. Some large invasive plants, like Saltcedar, can best be treated by overhead. BLM needs access to this technique. We do not support approval of Alternative D.

#### Alternative E No Use of Acetolactate Syntheses-inhibiting Herbicides Emphasis on Passive Restoration

This section puts severe restrictions on BLM for vegetation management processes. The blanket ban of a proven chemical family is not in the best interests of scientifically proven methods. This would remove a tool that is highly valuable when applied at the proper time, and on the proper targets. In Ada County we routinely use these chemistries on federal, state, local government and private lands with no adverse effects. If these chemistries are not allowed it will increase the cost of herbicide applications and decrease the effectiveness of the applications. This is contrary to a sound integrated weed management program approach. We do not support the approval of Alternative E.

#### Not Covered

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, after the EPA's approval. This is unacceptable for EDRR. There must be an approved process to herbicide use that will address new chemistry as it becomes available for general public use.

Sincerely,  
Brian K. Wilbur  
Lyle Larkin