

**NORTHSIDE TRI-COUNTY COOPERATIVE WEED
MANAGEMENT AREA
205 LUCY LANE
GOODING, IDAHO 83330**

**To: Brian Amme, Project Manager, BLM
PO Box 12000
Reno, Nevada 89520-0006**

EMC0404

January 17, 2006

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

**Integrated Weed Management practices, to include proper use of
herbicides to combat Designated State Noxious Weeds and Invasive
Plant Species on BLM lands must continue if these lands are to remain
viable. It has been proven over and again, that to control deep-rooted
perennial weeds, herbicides must be in use. Without the use of
herbicides, BLM land will become a biological desert, unable to support
a meager amount of wildlife and/or livestock.**

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**The alternative, being no use of herbicides on BLM lands, will put
adjacent lands at great risk of infestation. This action would put an
undo financial and biological burden on State, County and Privately
owned lands for the control of these plant species.**

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**As for the call to ban all Aerial Application of Herbicides, I would like
to say that not all BLM land is accessible by ground application
equipment. Further, today's technology for improved aerial spray
techniques is more targeted, more efficient and creates less impact on
the land than ground based operations. Get a bigger "bang" for your
buck, so to speak.**

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**THANK YOU
TERRY D. RUBY
SUPERINTENDENT**

SERVING GOODING/JEROME AND LINCOLN COUNTIES