

February 10, 2006

Brian Amme
BLM PEIS Project Manager
1340 Financial Boulevard
PO Box 12000
Reno, NV 89520-0006

see EMC0533

Dear Mr. Amme:

Wyoming Farm Bureau Federation represents many agricultural users of BLM managed lands in Wyoming and offers the following comments on the Draft Environmental Impact Statement (EIS) on Vegetative Management on BLM Lands. We support Alternative B.

Ranchers in Wyoming use BLM lands to graze livestock. Permits to graze on BLM lands are used in combination with privately owned property to form a viable ranching unit. Because much of the BLM managed land is interspersed with private property, BLM permits are necessary for continued viability of many ranches in Wyoming.

Proper vegetative management on BLM lands is crucial to the long term health of these rangelands, the survival of the Western grazing industry, wildlife management and recreational opportunities. BLM states that invasive or noxious weeds dominate more than 35 million acres of federal lands. Every tool available for the management of rangeland vegetation must be made available to ensure the viability of these lands for all the uses they are asked to provide. Alternative B provides the best option for the agency to meet the needs of all users of BLM managed rangelands in the West.

Herbicide use is an important and effective tool for vegetative management, and proven effective and safe chemical treatment options should be made available for use in conjunction with other time tested methods of vegetation management such as grazing and prescribed burning. The herbicides currently used by BLM and those proposed for use in Alternative B have received extensive review and scrutiny by the Environmental Protection Agency (EPA) in the registration or re-registration process, and have been found to be safe and effective for use. Potential risks are understood and used in the registration review process and in developing labels outlining the protocols for their use. There is no evidence that any of the products used or proposed to be used by BLM pose human health risks when used in accordance with label instructions.

With a wide range of herbicides available for use, the BLM, grazing permittees, and other users of BLM managed lands will be able to select for use the product that will meet the needs of the area in question. Chemical management used in conjunction with other tools such as grazing, prescribed fire, mechanical treatments, re-seeding and water development will improve the health of the rangeland, enhancing the many uses that we demand be available and protecting the health of the humans, domestic livestock and wildlife that must use these lands to survive.

Active management of BLM managed rangelands is imperative. Restrictions on the many non-chemical tools available for use have created much of the current problem the BLM is experiencing with invasive weeds on the lands managed by the agency. Livestock grazing has long been recognized as an effective means in reducing fuel loads, as well as reducing or preventing the introduction of harmful invasive and noxious weeds into western rangelands. In many areas, livestock have been specifically used for this purpose. Any management regime that restricts livestock grazing may actually be counterproductive and inconsistent with sound vegetative management.

We suggest that livestock grazing be more prominently considered in the final EIS as an important and proven effective and efficient tool to reduce fuel loads and manage the harmful and noxious weeds that have been invading the BLM managed lands in the west. Cattle, sheep and goats provide an ecologically safe and effective way to manage vegetation.

Using livestock grazing provides an economical and efficient solution to the restoration and treatment of BLM allotments. Use of livestock to restore the health of rangelands provides many benefits for other users of rangelands, providing for water developments as well as increased forage and cover for terrestrial and aquatic wildlife and the increased recreational opportunities that healthy wildlife populations afford. This option should be better developed in the final EIS.

BLM should consider how it will carry out its multiple use mandates during treatments under this plan. The proposal to increase the area of treatment has the potential to disrupt or displace existing uses, such as livestock grazing, use by wildlife and recreational use. Suspension of grazing permits for the 2-3 years required for range restoration work could result in many livestock producers being forced out of business, further reducing habitat opportunities for wildlife and the recreational experiences so valued by the citizens of the west. Proposals in the EIS considering displacement of livestock grazing permits for any period of time must consider all available options keeping permittees in business during the time their allotments are treated.

These proposals could include providing alternative pastures for grazing during the time a permittee's allotment is being treated; using vacant allotments not being treated; using the permittee's livestock to control weeds or reduce fire loads in a nearby area; or incorporating the use of livestock grazing and the appropriate chemical product in tandem on the allotment; creativity in season of use or for grazing or chemical treatment may be an option. This is an opportunity for the agency to use all the tools at its disposal to determine the effectiveness and the efficiency, in terms of cost and labor of those tools. It's a great opportunity for data gathering and analysis that will contribute to the existing knowledge base of rangeland science.

We appreciate the opportunity to provide comments; and are looking forward to working with BLM to develop an effective and efficient vegetative management strategy.

Sincerely,

Suzy Noecker
Field Service and Public Relations Director
Wyoming Farm Bureau Federation