



JOHN DAY/SNAKE RESOURCE ADVISORY COUNCIL

A Federal Advisory Committee

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Elaine Marquis-Brong
State Director
Oregon/Washington BLM
P.O. Box 2965
Portland, OR 97208

EMC0503

Dear Ms. Brong:

The following letter are comments relating to the Vegetation Treatments using Herbicides on BLM Lands in 17 Western States Programmatic EIS and Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Report

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Submitted by the John Day – Snake Resource Advisory Council
February 9, 2006

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Designated Federal Official

A. Barron Bail
c/o Prineville District
Bureau of Land Management
3050 NE Third Street
Prineville, OR 97754

The John Day – Snake Resource Advisory Council is federally chartered under the Federal Advisory Committee Act to provide recommendations to the Bureau of Land Management and Forest Service within the Northeastern Oregon and Southeastern Washington region. We thank you for including us in this important process, allowing us the opportunity to make comments.

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General Overall Comments

- We are overall supportive of the efforts of the BLM to increase prevention and treatment of invasive species, fuels treatment, and fire regime restoration. We are providing the following comments in the spirit of improving the document to make it more effective and less likely to be held up in a court of law.

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General Process Comments

- The timing of the release for these documents is poor, and does not give adequate review for a document that took several years

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to write, is hundreds of pages long and very complex.

- It does the BLM a disservice to expect meaningful comments when the comment period includes major holidays for everyone.

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- It is difficult to review such large documents without a hard copy. We appreciate the assistance of the BLM to provide a couple hard copies to our sub-committee members but the general public does not have access to the document except through the internet or CD. We further feel that the BLM should provide an electronic search mechanism to the CD version of the two documents such that members of the public and agency personnel can easily search this very large document.

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- The rationale for separating the herbicide use from the other vegetation management treatments isn't clear. By separating the other means of weed control into a separate document, it takes away from the integrated risk management aspect. Please clarify your intent.

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- We feel that BLM should describe the process by which this EIS will be used to develop on-the-ground treatments. Provide enough detail to describe the step-down process to on-the-ground projects.

Specific Comments on EIS

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- There needs to be greater emphasis on prevention in the document. No clear text or guidance is given to prevention of weed infestations. The document does state several times the importance of prevention, but only states actions that ought to be taken, rather than establishing some policies which would more clearly assist with prevention (such as those established by FS Region 6 (weed free hay requirements, vehicle washings, etc)).

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- There is very little discussion in the document as to the rationale for the massive amount of weed treatment being proposed in the EIS. We are supportive of the efforts of BLM to address the threat that noxious weeds pose to the health of public and private lands throughout the west. We feel that the BLM leaves itself susceptible to lawsuits and future obstacles by leaving out the huge body of peer reviewed literature that carefully documents the impacts of invasive species.

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- The practices discussed in Alternative E should be incorporated into the preferred alternative such as restricting activities such as livestock grazing, OHV use, logging or oil and gas development in areas where these activities have promoted a less desirable vegetation community or increased soil disturbance and erosion. Also the early detection /rapid response strategies from Alternative E should be incorporated in the preferred alternative.

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- Considerations regarding amphibians in alternative E should be included in the preferred alternative. A few of the chemicals proposed for use such as diquat, diuron, and tebuthiuron pose a potential risk to aquatic species and more detailed requirements for their use should be included in the document.

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- Chapter 2 page 2-18 the EIS states recommended use of herbicides with low toxicity to wildlife “where feasible”. That statement is like a red flag causing us to wonder what might be used and what circumstance would cause harm to wildlife. Perhaps the practice should be changed to “in all cases”.

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- Why is it, if current levels of herbicide use, according to the EIS, are 160,000 acres, that the “no action” alternative states 305,000 acres would be treated?

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- It is far more controversial addressing the use of herbicides to treat unwanted vegetation to reduce plant competition and enhance the growth of desired species than to control noxious weeds. The use of herbicides for wildland reduction of native species is highly controversial and either this use should be removed from the document or carefully justified. Using herbicide in this manner directly resulted in the lawsuit in Oregon, which completely eliminated the use of herbicides on public lands. Why risk the continuance of the injunction?

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- There should be more emphasis placed on developing weed management plans that would outline priority strategies, monitoring and delineate treatment recommendations based on the biology of the invasive species.

Specific Comments on Vegetation Treatment Programmatic Environment Report

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We like the use of ecosystem divisions in the report to discuss vegetation treatments. The BLM lands within our RAC area are located in the Temperate Desert Ecoregion. The document states that 60% of fire treatments would occur in these vegetation types although the

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review of fire effects in the report state that in the evergreen shrubland (sagebrush types) repeated fires in less than 30 to 50 years would generally have an adverse affect on native communities with an increase of annual grasses. We want to emphasize that those using prescribed burning should proceed with caution in these sagebrush and juniper communities with tendencies for non-native annual grasses to dominate. Monitoring is essential.

Thank you for the opportunity to comment.

Sincerely,

John A. Tanaka, Chair
John Day/Snake Resource Advisory Committee