



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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January 9, 2006

Project Manager
National Vegetation EIS
BLM Nevada State Office
P.O. Box 12000
Reno, Nevada 89520-0006

Re: Arizona Game and Fish Department Comments on Draft Programmatic EIS and Environmental Report for Vegetation Treatments on Public Lands Administered by the BLM in the Western States, Including Alaska

Dear Sir or Madam:

- 1 The Arizona Game and Fish Department (Department) reviewed the Draft Programmatic Environmental Impact Statement (DEIS) and Environmental Report for Vegetation Treatments on Public Lands Administered by the BLM. The Department recognizes the threat hazardous fuels and the spread of noxious weeds pose to wildlife and wildlife habitats. The Department supports efforts to reduce hazardous fuels and control noxious and invasive weed species in order to restore native vegetation, promote ecosystem health, prevent losses in the productive capacity of the land, and to avoid declines in riparian habitat values. We request that close coordination between the Department and BLM occur prior to the implementation of treatments to reduce negative impacts to wildlife and wildlife habitat.
- 2 The Department's specific comments are listed as an attachment to this letter. We appreciate the opportunity to review the DEIS and look forward to working with the BLM during the development of site-specific projects. Please contact me at (602) 789-3605 if you have any questions regarding this letter.

Sincerely,

Bob Broscheid
Habitat Branch Chief

BB:lc

Attachment

Attachment

Arizona Game and Fish Department Comments on the Draft Programmatic EIS and Environmental Report for Vegetation Treatments on Public Lands Administered by the BLM in the Western States, Including Alaska

- 3 | **A. General** – The Department supports the idea of vegetation treatments designed to improve fish, wildlife, and native plant habitats. We applaud the Bureau’s efforts to use additional tools and strategies to address vegetation concerns, particularly invasive species issues. We request that the Department be involved with treatment planning and implementation level activities. Additionally, we request BLM coordinate with the Department regarding potential negative impacts to any potentially affected wildlife population (including game species) prior to implementation of treatments.
- 4 | **B. Fire** – The use of prescribed fire is the Department’s preferred alternative for vegetation treatments outside of the Sonoran and Mojave Desert eozones. Fires timed to provide low-intensity, mosaic burns are preferred. We recognize fire may be ineffective in achieving management goals for areas dominated by cheatgrass and other invasive species, and that alternatives need to be explored. We strongly recommend that post-fire management include an appropriate level of grazing deferment, preferably at least two growing seasons.
- 5 | **C. Mechanical** – We support the use of mechanical control, where appropriate. Soil disturbance often leads to increased abundance of invasive species. Post treatment follow-up may need to include a chemical application to reduce noxious weed establishment.
- 6 | **D. Manual** – No comments.
- 7 | **E. Biological Treatments** – We recommend the BLM use domestic grazing animals as a means of vegetation treatment with caution. While certain grazing systems can and do provide benefit to certain plant communities, our experience in arid ecosystems is less than satisfactory. Additionally, due to disease concerns, use of domestic sheep and/or goats is not acceptable in areas inhabited by bighorn sheep, or in any adjacent area where the potential for any contact with bighorn sheep could occur.
- 8 | **F. Herbicides** – Herbicide application alone, or combined with other treatments has proved effective in reducing noxious vegetation. Currently some application of this methodology, combined with mechanical control, is being used with some success in southeastern Arizona to restore Chihuahuan desert grasslands. We request close coordination between the BLM and the Department occur prior to application of herbicides due to the potential negative affects these may have on fish, wildlife, and/or native plant species.

National Vegetation EIS

January 9, 2006

2

cc: Jim deVos, Chief, Research Branch
Eric Gardner, Chief, Nongame Branch
Leonard Ordway, Chief, Game Branch
Regional Habitat Program Managers