

To: Brian Amme, Project Manager, BLM
P.O. Box 12000, Reno, NV 89520-0006
Fax 775-861-6712
vegeis@nv.blm.gov

Caribou County Weed Control
159 South Main, #202
Soda Springs, ID 83276

See FL-0004

From: name / organization Caribou County Weed Control
Weed Supervisor *O. Paul Johnson*

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

With out the help of hericides this project could not have been
OPTIONAL SECTION completed.

Personal experience or Organization description See enclosed article

Comments

Proper use of the most effective herbicide for a specific vegetation treatment will result in overall decreased use of herbicides. Herbicides are rarely needed in a healthy environment where limited or infrequent stress is put on an intact plant community. However, the introduction of invasive plants, too frequent fire, over grazing, and drought have resulted in fragmented desirable plant communities threatened by invasive plant dominated adjacent communities. To rehabilitate and increase acres of plant communities that are resilient to invasive plants, herbicides must be an option for any integrated vegetation treatment program. A national policy that does not approve herbicide use or restricts use of ALS inhibitor herbicides or does not allow aerial application under any circumstance will NOT result in improvement or rehabilitation of infested land. Consequently, limiting or stopping use of herbicides on BLM will result in greater economic hardship for neighboring properties (federal, state and private) as wildfires, invasive plants and erosion problems know no boundaries.

Alternative A No Action Alternative

The continuous degradation of BLM land is evidence that *Alternative A* does not provide the tools needed for Hazardous fuel reduction programs, Emergency Stabilization or Rangeland Rehabilitation. BLM lands will continue to degrade at an accelerated rate if vegetation treatment continues under alternative A. I do not support Alternative A.

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

Although greater acres are initially treated under this alternative, the newly available herbicide, diflufenzopyr, will help to reduce overall active ingredient applied for control of numerous weed species. The product imazapic will result in more resilient plant communities not in need of annual herbicide treatments. Addition of the two new aquatic products will allow rapid response to any aquatic weed problems.

Loss of old herbicide chemistry such as 2,4-DP, asulam, atrazine, fosamine, mefluidide and simazine is acceptable.

I strongly support the approval of Alternative B.

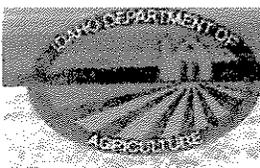
Alternative C No Use of Herbicides

It has been proven in operational control programs and numerous research studies for numerous weeds (deep rooted perennial weeds, large scale infestation of annual weeds), that control efforts minus herbicides are ineffective. Without the use of herbicides, BLM land will eventually become a biological desert, unable to even support livestock. This alternative puts all adjacent lands in great risk, including our National Parks, State lands, private property and Forest Service resources.

I do not support Alternative C.

Alternative D No Aerial Applications

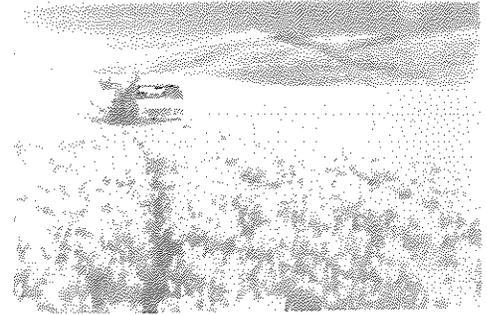
With today's technology for improved aerial spray techniques (including booms, nozzles, GIS capability), aerial application of herbicides is more targeted, more efficient, creates less impacts/disturbance/drift, and can be more effective than ground applications. "Greater Drift" impact is minimized by use of selective herbicides and new application technology.



HIGHLIGHT PROJECT

IT CAN BE DONE! Yellow Toadflax Defeated At Blue Mountain

In 1994, The Caribou County Weed Department received a phone call about a Yellow Toadflax (*Linaria vulgaris*) infestation in a farmer's field on the south end of Grays Lake near Blue Mountain. This area is heavily used by Elk and the field is surrounded by prime rangeland. The infested 70 acre field was the largest in the county. The farmer hoped to control the infestation by using an offset disk to work the ground several times a year to keep the plant from going to seed. This method worked to control seeding in other areas but was of little benefit in this field because of the plant's ability to grow from creeping roots.



Infestation in 1996

By 1996 the toadflax was so thick that the farmer was unable to use the field. During this time, John Cantlin with Dupont Company contacted the Caribou County Weed Control (CCWC) looking for Yellow Toadflax test plots. In 1997, one half of the field was sprayed with 2 oz Escort and the second half with 2 oz of Telar. The rate of water was 15 gallons per acre. Unfortunately, the results were disappointing possibly due to the low rate of water per acre.

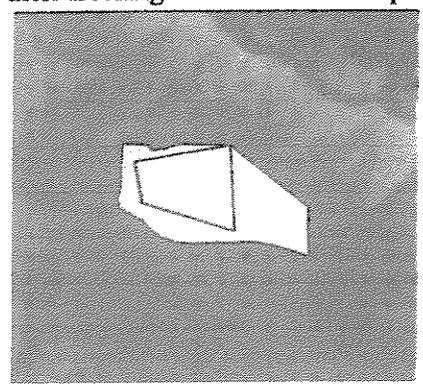


Infestation in 2004

In 1998, it was decided to divide the field into 3 test plots, use different chemicals, and increase the water rate to 60 gallons per acre. The first plot was Plateau, which was furnished by John Smith of BSAF, applied at 12 oz per acre. The second plot was Roundup Pro applied at a rate of 4 pints per acre. The last plot was sprayed with Tordon at 4 pints per acre and Escort at 1 oz per acre.

In evaluating the project, it was decided that Roundup Pro gave the best results. For this reason, the entire 70 acre patch was sprayed with Roundup Pro in 1999. By 2000, the infestation in the field was greatly reduced. However, there were enough plants to warrant spraying for another year. It was decided to go with Roundup Pro again. Although Roundup Pro did create bare spots, the local grasses and forbs returned to the field on their own.

In 2001 and 2002 it was decided that the field would not have to be sprayed. In 2003, there was enough of a problem that spraying continued by agreement with the landowner and CCWC. It was spot sprayed in the fall after freezing so that the Roundup Pro had a limited affect on the grass. The field had enough evidence of grass competition that it was not sprayed in 2004. The population has been reduced to scattered plants with approximately 5% density across the entire 70 acre field.



Through 1997 and 2000, the Idaho State Department of Agriculture (ISDA), CCWC, and the Landowner participated in a cost share agreement to spray this infestation.

For more information on the project, please contact Paul Jenkins at (208) 547-4483 or ccweed@allidaho.com.

Map Explanation: Map of infestation. Dark yellow areas of original infestation in 1994, 100% density. White with yellow dots is the infested area in 2001, 25% density.

Caribou County Weed Control
159 South Main
Soda Springs, Idaho 83276
(208) 547-4483
(208) 547-3241 FAX
ccweed@allidaho.com

February 15, 2005

Dear Senator Craig:

A few years ago we sent you a picture of a spray truck in a large field of Yellow Toadflax.

As this was an example of a severe infestation of a noxious weed we needed to do something about the problem.

I'm happy to report we have had great success in getting rid of this problem. There have been many partners who have joined in to fight this problem.

I'm enclosing an article done by the Idaho Department of Agriculture that might be of some interest to you.

I have a poster hanging in the county court house with the two pictures side by side shown in the above-mentioned article with the caption under them of "IT CAN BE DONE".

Thanks again for all you have done to help with the war on invasive plants.

D. Paul Jenkins
Caribou County Weed Supervisor