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Bureau of Land Management Nevada State Office Attn: Brian Amme, EIS Project Manager 1340 Financial Blvd. PO Box 12000 Reno, NV 89520-0006 FAX (775)861-6712; E-mail: <u>vegeis@nv.blm.gov</u>



Dear Mr. Amme:

The Oregon Cattlemen's Association (OCA) would like to comment on the proposed alternatives and preferred alternative within the PEIS and PER.

Noxious weeds have a very negative impact on the livestock industry in Oregon relating to loss of forage, hay production, poisoning, and fire danger which threatens grazing land and wildlife habitat. The BLM should desire to control weeds on the public's land so as to protect the land for its resource, aesthetic, and safety values. The BLM has a duty to control weeds on its administered lands and should be considerate of landowners who own property near BLM whether they be other public land and private land.

The Oregon Cattlemen's Association supports the preferred alternative. **Alternative B** expands herbicide use and allows for use of new herbicides in 17 Western states. The chemicals listed have been registered with the USEPA and must be used in accordance with label restrictions. By giving the BLM an expanded "toolbox" to use in controlling weeds, it will make the current programs more cost effective in gaining better control. This will enable the BLM to use many selective herbicides when other plants species need to be protected.

All the other alternatives listed would be counterproductive to effectively control the noxious weed problem. The OCA would like to comment briefly on the other alternatives which make **Alternative B** the most sensible proposal.

Alternative A – Continue present herbicide use: Under this alternative the BLM would not be treating as many acres of infested lands and would not be able to use new chemicals that are approved by the USEPA. The BLM also needs to have the chemicals available for use on Oregon lands to be expanded for better weed control.

Alternative C – No use of herbicides: This alternative would be catastrophic by allowing noxious weeds to go unchecked on hundreds of thousands of acres. Alternative C would also allow millions of other land ownerships to be at risk of total infestation.

Alternative D – No aerial applications: Often, aircraft can spray more cost effectively than ground application equipment. Without the option to use aircraft, many areas would have to be left untreated which would not be good stewardship of the land.

Alternative E – No use of Acetolactate Synthase-inhibiting herbicides: This alternative submitted by several special interest groups is an attempt to further hinder the BLM in weed control. These chemicals are very

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effective and two of the chemicals, chlorsulfuron and metsulfuron methyl, are selective herbicides that for the most part leave the desirable plants and control noxious weeds in many environments in the Western states.

In closing, the OCA would like to see the BLM select Alternative B which will benefit the public and environment. If noxious weeds are not controlled effectively on BLM lands the entire Western US will suffer consequences. Production of renewable resources on public and private land will be in danger. Increased fire danger, drastic reduction of wildlife habitat, and decreased food and fiber production will be the trend if our BLM lands are not enhanced and protected from noxious weed invasion.

Thank you for the opportunity to comment on the PEIS and PER.

Sincerely,

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John & O.Z.f.

John O'Keefe OCA Public Lands Committee Chair

Jesse Laird OCA Public Lands Committee Member