

EMC0323

January 6, 2206

Brian Amme, Manager
Vegetation EIS Project
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520-0006

RE: Vegetation Treatments Using Herbicides on BLM
Lands in 17 Western States, Programmatic Environmental
Impact Statement

Dear Mr. Amme:

- 1 The following are Uintah County's comments on the Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States.
- 2 Throughout the Western United States there are areas in which habitats are marginally functional, or that have lost their function. These conditions exist because of past management decisions; in particular, the removal of the role of fire in maintaining their proper function.
- 3 Restoration of these habitats is critical, as failure to do so greatly impacts their value and function for watershed, habitats, and other uses.
- 4 Habitat restoration is a priority of Uintah County. Last year alone we participated in the rehabilitation of over 15,000 acres of such habitats on federal and private lands in the Uintah Basin. Many acres remain to be treated, but due primarily to the presence of cheat grass, biological and mechanical treatments alone will not be effective.
- 5 It is critical that these areas are restored. The Uintah Basin is host to many threatened and endangered (T&E) species, important wildlife populations and sensitive species, such as sage grouse. Failure to restore these habitats to their proper function will be an ecological and economic disaster for the area.
- 6 In order to restore these habitats, land managers must have available all of the tools necessary. Management flexibility, mechanical treatment and chemical treatments must be available and

applied in a prudent manner.

- 7 In consideration of the above, Uintah County fully supports the preferred alternative and finds it to be the only acceptable one. Failure to provide chemical treatment as an option for habitat restoration will lock up thousands of acres in a dysfunctional condition. In many cases it can render the acreage useless in the future and force changes in the area's ecology.
- 8 Uintah County wants clear direction provided to field managers when the preferred alternative is implemented. Proper management should be the first option considered for habitat restoration, followed by biological , mechanical, then chemical, in that order. Chemical treatment should not be used as a quick fix for habitats.
- 9 Prior to initiation, a project analysis must be performed to insure that the most effective, economical, and timely method is chosen. Additionally, monitoring of reclaimed areas must be performed to determine effectiveness of treatments and the need for followup and maintenance.
- 10 At this time Uintah County has no further comments but reserves the right to comment at a later date, if warranted.

Sincerely,

UINTAH COUNTY COMMISSION

Michael J. McKee, Chairman

Jim Abegglen

David J. Haslem