

**City of Carson City
Agenda Report**

Date Submitted: June 9, 2015

Agenda Date Requested: June 18, 2015

Time Requested: 10 minutes

To: Mayor and Board of Supervisors

From: Parks and Recreation Department – Open Space

Subject Title: For Possible Action: To authorize the Mayor to sign a letter addressed to the Bureau of Land Management providing comments on the Carson City District Draft Programmatic Environmental Assessment Integrated Weed Management Plan. (Rich Wilkinson)

Staff Summary: The Bureau of Land Management (BLM) released the Draft Programmatic Environmental Assessment Integrated Weed Management Plan in May 2015. This updated document will allow for additional herbicides to be used on BLM lands as well as increasing the variety of treatment methods allowed such as: manual treatments accomplished by grubbing, pulling or cutting; biological treatments accomplished through targeted grazing, the introduction of insects or microorganisms; and prescribed fire may be used in conjunction with these other treatment methods. The deadline for comments is July 1, 2015.

Type of Action Requested: (check one)

Resolution Ordinance
 Formal Action/Motion Other (Specify)

Does This Action Require A Business Impact Statement: Yes () No

Recommended Board Action: I move to authorize the Mayor to sign a letter addressed to the Bureau of Land Management providing comments on the Carson City District Draft Programmatic Environmental Assessment Integrated Weed Management Plan.

Explanation for Recommended Board Action: The Draft Programmatic Environmental Assessment Integrated Weed Management Plan is the tool used by the BLM to provide long-term policy and direction towards the management of invasive weeds on lands under their jurisdiction. With the additional herbicides and treatment methods, it will allow for more treatment and the potential of improving treatment results.

Staff has reviewed the document and spoken with a representative of the Carson City BLM Field office and we feel that the creation of this Integrated Weed Management Plan (IWMP) is a positive step. The creation of this plan expands options for land managers to more effectively manage noxious or invasive weeds on public (BLM) properties. The increase of available herbicides allows for use of newer herbicides that are more effective and less toxic than some of the older chemistries. By expanding the eligible herbicides, it also allows the applicator to try a new herbicide which might work on resistant plants. These techniques can be implemented individually or in combination to effectively treat infestations.

The document can be accessed through the BLM Carson City District Office homepage or the internet at <http://on.doi.gov/JXec8V>.

Applicable Statute, Code, Policy, Rule or Regulation: National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.)

Fiscal Impact: N/A

Explanation of Impact: N/A


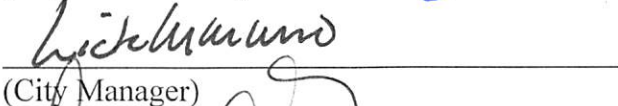
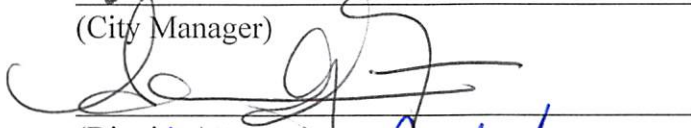
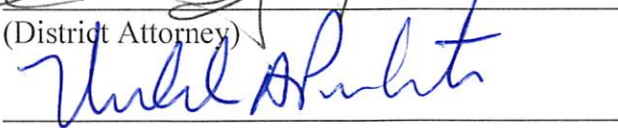
Funding Source: N/A

Alternatives: Direct staff to revise the comments or make suggestions to add any information that may be considered necessary.

Supporting Material:

- Draft letter addressed to the Bureau of Land Management

Prepared By: Richard Wilkinson, Senior Natural Resource Specialist

Reviewed By:  Date: 6/9/15
(Department Head)
 Date: 6/9/15
(City Manager)
 Date: 6-9-15
(District Attorney)
 Date: 6/9/15
(Finance Director)

Board Action Taken:

Motion: _____ 1: _____ Aye/Nay

2: _____

(Vote Recorded By)

June 18, 2015

Dean Tonenna
BLM, Sierra Front Field Office
5665 Morgan Mill Road
Carson City, Nevada 89701

Re: Comments on the BLM Carson City District Draft Programmatic Environmental Assessment Integrated Weed Management Plan

Dear Mr. Tonenna,

Carson City is submitting the attached comments on the BLM Carson City District Draft Programmatic Environmental Assessment Integrated Weed Management Plan. Thank you for this opportunity, and we look forward to further discussions and collaborative efforts with the BLM.

If you have any questions, please feel free to contact Richard Wilkinson, Senior Natural Resource Specialist, at (775) 283-7341 or rwilkinson@carson.org.

Sincerely,

Robert L. Crowell
Mayor

Attachment

**Carson City comments regarding the
Bureau of Land Management, Carson City District
Draft Programmatic Environmental Assessment / Integrated Weed Management Plan**

Background / Purpose of Document: BLM has identified the need to create a Programmatic Environmental Assessment (EA) / Integrated Weed Management Plan (IWMP) for the following reasons.

- To treat current and foreseeable future infestations of noxious and invasive weeds to promote land health within the Carson City BLM District.
- The current 2008 BLM EA only includes analyzing chemical and mechanical treatments and by allowing biological, manual and targeted grazing we would be able to manage invasive or non-native plants more successfully.
- The current 2008 EA is not broad enough to actively manage the changing resource conditions including the designation of new BLM sensitive species and the new listing of threatened or endangered species.
- Current EA only lists between 200 and 300 sites of weed infestations on approximately 400 to 750 acres of public lands.
- If no action is taken on this plan, invasive weeds would continue to be treated under the current 2008 EA which limits land use managers by limiting newer and more effective herbicides and not allowing for additional treatment methods.
- Under the current 2008 EA, the only treatment that can occur would be listed in the 2008 document. This would require a new EA if any new treatment needs are found and this would not allow Early Detection and Rapid Response techniques.

The proposals for treatment methods are as follows:

- Manual treatments accomplished by grubbing, pulling or cutting;
- Mechanical treatments accomplished by plowing, mowing, roller chopping, disking or tilling methods;
- Biological treatments accomplished through targeted grazing, the introduction of insects or microorganisms;
- Chemical treatments accomplished by use of one or more of the BLM-approved herbicides; and/or
- Prescribed fire may use in conjunction with these other treatment methods.

Positives:

Carson City would like to highlight the positive highlights of the proposed document.

- The document allows for additional herbicides, adjuvants and surfactants to be eligible for use on BLM properties. This allows newer, more efficient and less toxic herbicides to be used which we feel will improve overall success rates.
- The document also increases the variety of treatments that can be done on BLM properties by including manual, biological and targeted or prescribed grazing techniques.

This gives land managers more options to work with which should increase the amount of treatment and success of treatments.

- If the DNA option is available and the treatments can be addressed on a site by site basis this may bypass the need to complete a full NEPA and allow for early detection and rapid response techniques to be used which could help eradicate infestations before they become out of hand.
- This document identifies temporary impacts associated with weed treatment techniques as short term and less intrusive than leaving the areas untreated. Staff agrees that it is critical from a soil, water; habitat and native vegetation stand point to eradicate invasive weeds as much as possible.
- Carson City agrees that allowing the expansion of the eligible herbicide list would help insure that plants do not develop a resistance to existing herbicides. This is a very good reason to change the herbicide occasionally to minimize the risk of resistant plants.

Concerns:

Carson City has reviewed the document for potential impact to land use as well as our residents. It is our understanding that the current Environmental Assessment that BLM is operating under was completed and approved in 2008. After discussions with a BLM representative regarding this document and the recent abatement, it was determined that BLM could have been implementing treatments on BLM property while the current Resource Management Plan (RMP) was being completed. We want to express concern that little or no abatement has been completed by the Carson City District Office during this period. While reviewing this document, staff noted that one of the purposes of creating this new document was to establish a protocol for invasive weed abatement on BLM properties. Carson City agrees that the existing 2008 EA does not allow for some herbicides or treatment methods to be used. This is a concern since abatement of herbicide resistant plants may require different herbicide chemistry. Utilizing the same herbicide over and over again will result in a plant adapting and becoming resistant. One concern is that the opportunity to implement treatments has been utilized by other district offices during the RMP process while the Carson City District Office has made the decision not to treat. One concern is creating a document with options and not acting on those options in an effort to actively manage BLM properties.

In a phone conversation with Dean Tonenna, BLM Botanist, he advised that the new Programmatic agreement would allow for a process Determination of NEPA Adequacy (DNA). This one-page document would allow for treatment of new infestations that occur on public property if it is determined that NEPA is not necessary. There is also the potential of a temporary exclusion which would allow BLM staff to allow treatments if they did not have any concerns. This still does not seem to allow for Early Detection and Rapid Response techniques as there is additional time required to infer with all parties. This document does not discuss DNA and it should be referenced as a part of the document.

Suggested changes / clarification to the document:

- Can treatments occur under the current 2008 EA?
- Please clarify and add the DNA policy for easy reference within this document.
- Please explain the potential for a temporary exclusion and its protocol within the document.

- Page 24 Table should separate the acreage of annual grasses from invasive weeds for reference purposes and not keep them lumped together.
- Does this document work with or supersede other documents which are referenced within this Integrated Weed Management Plan?
- Page 43 BLM manual 6330 recommends guidance to control non-natives species. Carson City recommends allowing some seed mixes for restoration to have non-native seeds that are deemed beneficial to the reseeding effort.
- Carson City recommends that BLM work with local stakeholders to help develop techniques that are effective and more efficient. This collaboration will also help encourage adjacent property owners to work with locally led efforts.
- Carson City recommends that BLM and project partners share mapping data so that all parties can be aware of potential invasive weed threats that are found.
- Within the document and on multiple pages, BLM states the effects of treatment techniques. This sounds as if they are certain to happen and should be changed to reflect potential effects.
- There is a process to collaborate with local tribes regarding cultural and historical resources. If this is to occur, is there a timeline and would that timeline pose a problem with addressing invasive weeds in time? Carson City believes that timing is critical and the process should be streamlined as much as possible to allow for quick access and treatments.
- Is a Cultural and Historical survey or assessment always going to be required or can BLM and project partners put together a large scale strategy so that priorities are placed in transportation vectors where most seed sources are introduced.
- While speaking with Mr. Tonenna, he explained that the document would be valid for 10 years and online it states 15 years. Can you please clarify how long this document will be valid?