



May 2, 2022

Seth Flannigan  
Bureau of Land Management  
Project Manager  
1387 S. Vinnell Way  
Boise, ID 83709

Dear Mr. Flannigan,

The State Weed Coordinator Alliance is writing to urge the Bureau of Land Management (BLM) to approve the use of several herbicide active ingredients proposed in the Notice of Intent (2022-07017).

Seventy-nine million acres of BLM managed public lands have been impacted by invasive plants; sixty million are Western sagebrush steppe. To quote the Department of Interior “One of the BLM's highest priorities is to promote ecosystem health and one of the greatest obstacles to achieving this goal is the rapid expansion of weeds across public lands. These invasive plants can dominate and often cause permanent damage to natural plant communities. If not eradicated or controlled, noxious weeds will continue to jeopardize the health of the public lands and to constrain the myriad activities that occur on public lands.”<sup>i</sup> To adequately address this problem, new tools like indaziflam and the other active ingredients proposed must be quickly incorporated into existing management practices.

The conservation of sagebrush steppe habitat on BLM administered lands in the West is critical to the long-term viability of the greater sage-grouse and many other species of plants and animals in the western United States. One of the primary threats facing this ecosystem is the conversion of native sagebrush plant communities to invasive annual grass dominant landscapes. Invasive grasses like cheatgrass (*Bromus tectorum*), medusahead (*Taeniatherum caput-medusae*), and ventenata (*Ventenata dubia*) have plagued this ecosystem throughout the West for decades. Indaziflam has filled a needed niche within the toolbox of management for invasive annual grasses - selective, long- term suppression of annual grasses. As an active ingredient, it has been thoroughly vetted through the Environmental Protection Agency and Academic research. Research has shown indaziflam can provide extended control of invasive annual grasses. In field studies it has provided 83 -100% control in the third year after treatments compared to the significant reduction in control by the third year with herbicide treatments that currently have approval for use on BLM lands.<sup>ii</sup> In addition, the U.S. Forest Service has completed pesticide-use risk assessments for each of the active ingredients proposed and has incorporated them into their management programs. We urge the BLM to do the same.

Converting native bunchgrass and forb communities into monocultures of unsuitable and unpalatable annual grass has dramatically altered the fire cycle of the sagebrush ecosystem and have increased the extent, frequency, and intensity of fires. In both the FY 2020 and FY 2021 budget the federal government allocated \$952 million for wildland fire suppression. Preventative measures, such as the management of invasive annual grass, can assist agencies such as the BLM in reducing the incidence of catastrophic fires and protect the ecological and economical values of the western rangelands. Invasive annual grasses are a landscape-scale issue with significant impacts on natural ecosystems and large management costs. Unfortunately, not all effective tools are currently being utilized by the BLM to address invasive plants which has forced management areas to use ineffective or expensive alternatives.



There must be a strategic approach to mitigating the impacts of invasive grasses that includes policies and management tools that reach across jurisdictional boundaries. We urge the BLM to take immediate steps to approve the proposed active herbicide ingredients for inclusion in management programs incorporating BLM administered lands. Thank you for considering our request.

Sincerely,

Jasmine Chaffee, SWCA Chair  
State Noxious Weed Coordinator/Manager  
MT Dept. of Agriculture  
Helena, MT 59601  
[jchaffee@mt.gov](mailto:jchaffee@mt.gov)

---

<sup>i</sup> "Programs: Natural Resources: Weeds and Invasives: Bureau of Land Management." *Weeds and Invasives / Bureau of Land Management*, <https://www.blm.gov/programs/natural-resources/weeds-and-invasives>. Accessed 29, April 2022.

<sup>ii</sup> Derek J. Sebastian, James R. Sebastian, Scott J. Nissen, K. George Beck. "A Potential New Herbicide for Invasive Annual Grass Control on Rangeland." *Rangeland Ecology & Management*, Volume 69, Issue 3, 2016, Pages 195-198, ISSN 1550-7424, <https://www.sciencedirect.com/science/article/pii/S1550742415001517>. Accessed 29, April 2022.