



Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

20 September 2004

Mr. Dave White
Natural Resources Conservation Service
10 E. Babcock Street
Bozeman, MT 59715

Dear Mr. White

We are writing on behalf of nearly 500 members of the Montana Native Plant Society (MNPS). We are an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. We are writing to comment on the proposal to use money from the Environmental Quality Incentives Program (EQIP) to fund herbicide treatment of Montana's native rangelands.

While Grazon may be a useful tool in some tame grass pastures or hayfields, the use of this product on native rangeland makes little sense from either a production or ecological standpoint. As a non-selective broadleaf herbicide, Grazon impacts a broad spectrum of desirable native forb species. These species play important roles in nutrient cycling and provide cover to increase soil moisture retention and reduce soil loss from wind and water erosion. In addition, native nitrogen fixing legumes increase available nitrogen in the soil and some native forb species are directly utilized by livestock as a component of their diet. Research at MSU has shown that rangeland treated with picloram was less resistant to weed invasion than untreated rangeland with a healthy native forb component. In addition to the obvious utilitarian benefits, native broad-leaved species are vital components of prairie ecosystems which have sustained a wide array of other species (including large grazers) for millennia. Diversity is the underpinning of a healthy ecosystem, and reducing diversity to benefit one component of that system is not sustainable.

A study done for the U.S. Forest Service suggested that careful one-time application of picloram did not affect native broad-leaved plant composition. Whether or not this study is an anomaly is irrelevant because herbicide application on the ground is rarely done with the care taken by researchers, and the efficacy of one-time applications on aggressive exotics is doubtful. A ranch south of Polson (formerly Jarecki Ranch) has had picloram applied by airplane every five years for at least 20 years. A site inspection five years ago indicated that few native broad-leaved plants remained. Areas treated with picloram often become more susceptible to noxious weed invasion than untreated areas. Pastures at Pine Butte Swamp Preserve were treated with picloram for three consecutive years to manage leafy spurge. After five years these pastures supported dense infestations of leafy spurge, and native broad-leaved plants were virtually absent.

Broadcast spraying of rangeland should not be subsidized by tax dollars because it will frequently result in degradation of rangelands and loss of natural resource values.

Promoters of Grazon distort its potential for increased grass production on Montana rangeland. Study sites often productive areas, characterized by adequate moisture, deeper soils, etc. It is unlikely these results can be duplicated on typical native rangeland in Montana. We have seen Grazon used on rangeland that has very little grass production due to chronic poor management or marginal soil and climatic conditions or both. The use of Grazon on such sites will ultimately serve to reduce total vegetative cover, further limiting site productivity through loss of soil and soil moisture. Additionally, since Grazon can initially provide some short-term gains in grass production, it may encourage producers to inappropriately increase stocking rates, further diminishing long-term site productivity.

Herbicide can play a role in an enlightened plan for integrated pest management. It might make sense to allow EQIP payments to land stewards who develop long-term weed management plans that truly protect natural resources on rangelands by emphasizing early detection and monitoring of weeds, biological control, sustainable livestock grazing, and limited use of herbicide.

Broadcast herbicide application is a simple-minded, short-sighted fix for a multifaceted problem. Very often the root of the problem is poor livestock management. If rangeland is continually overgrazed, no amount of herbicide will solve a weed problem for long. We urge the Natural Resources Conservation Service to take a hard look at the actual long-term costs and impacts of the use of Grazon on native rangelands and discourage its use. We are concerned that Grazon is just another quick fix proposal that will in the long run leave the land and the people on the land poorer. Grazon is no substitute for sound range management. Under no circumstances should the use of broadcast herbicide be subsidized by federal tax dollars under the pretense of natural resource conservation. Thank you for considering our comments.

Sincerely,

Elizabeth Kuropat
President

Peter Lesica
Conservation Chair

cc: Steve Pilcher, Montana Stockgrowers Association