



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

December 21, 2005

Bureau of Land Management
Nevada State Office
Attn: Brian Amme, EIS Project Manager
PO Box 12000
Reno, NV 8920-0006

Dear Brian Amme:

- 1 The following are the brief comments regarding the draft *Vegetation Treatments Using Herbicides Programmatic EIS (PEIS) and the Vegetation Treatments Programmatic Environmental Report (PER)*. Both apply to the Bureau of Land Management lands in the 17 western states.
- 2 The Public Lands Foundation (PLF) is a national 501 (c)(3) organization founded in 1987 and headquartered in Arlington, Virginia. PLF's mission is to foster the proper use; protection, restoration, conservation and management of the BLM administered lands. PLF currently has more than 1000 dues paying members who support the Foundation's mission. All PLF members, most of who are retired former BLM employees and its Board of Directors serve without compensation as volunteers. Our membership represents a vast cross section of natural resources knowledge and experience. PLF is a fast-paced, passionate advocate organization focused on the management of BLM lands; keeping policy makers and the general public aware of what is happening to the public lands.
- 3 We understand that the PEIS and PER have been developed to provide BLM with a wide environmental analysis to guide vegetation treatments that can be used by the local field offices of BLM in carrying out the management decisions made by local land use plans. These reports replace analyses contained in four prior vegetation treatment EISs and have incorporated new information and conditions and circumstances that may influence changed treatment requirements. In addition new initiatives such as the National Fire Plan, the Great Basin Restoration Initiative, the Healthy Forest Initiative and the need to control the wide and fast spread of noxious weeds require this updated impact analysis.
- 4 Members of PLF attended several of the field scoping meeting leading to the preparation of the PEIS and PER. It was very apparent that the primary controversial issue at these meetings was the use of herbicides in vegetation treatment programs. We therefore support the need for the special attention being given to the use of herbicides and endorse

the selection by BLM of the preferred *Alternative B- Expanded Herbicide Use and Allow for Use of New Herbicide in 17 Western State*. Under this alternative approximately 900,000 acres of BLM lands would be treated annually using herbicides. The majority of treatments would occur in Nevada, Idaho, Oregon and Wyoming. This alternative would enable BLM to use 14 active ingredients and new chemicals that may be developed in the future.

5 We congratulate the BLM for preparing this very comprehensive and massive PEIS and PER and Appendixes.

Sincerely,

A handwritten signature in cursive script, appearing to read "George Lea".

George Lea, President