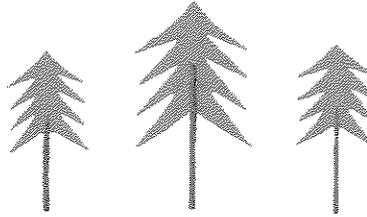


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February 10, 2006

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

By Fax & Regular Mail
Fax: 775-861-6712

Re: Programmatic Vegetation Treatments EIS

Dear Mr. Amme:

1 This Association represents the interests of Western Oregon Counties that have an interest in 2.1 million acres of BLM timberlands pursuant to the O&C Act of 1937, 43 USC §1181a et seq. We are writing to comment on the alternatives set forth in the Programmatic Vegetation Treatments EIS ("PEIS") for 17 Western States, including Oregon. It is our understanding that the PEIS will not completely resolve the partial herbicide ban in Oregon, but will be a step toward that end.

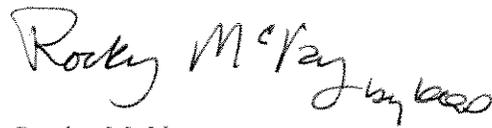
2 The O&C Lands managed by the BLM suffer from many of the same problems that the PEIS is intended to address on BLM managed lands elsewhere: fire prone vegetation, broadleaf vegetation that interferes with conifer reforestation, and displacement of native species by aggressive, noxious, invasive non-native species. We are pleased that the BLM is developing comprehensive plans to address these problems.

3 This Association supports a combination of methods for controlling vegetation that includes the judicious use of appropriate herbicides. Developments since the Oregon partial ban went into effect many years ago have rendered the existing limitations on herbicide use obsolete. New information and new safer herbicides should justify an expansion in the use of herbicides to address the forest health issues confronted by the BLM.

4 This Association supports herbicide use that will reduce wildland fire risk, improve vegetation conditions, enhance rapid reforestation, improve fish and wildlife habitat, or improve watershed functions. It appears that Alternative 2 in the PEIS would best achieve these goals.

Thank you for the opportunity to comment.

Very truly yours,

Handwritten signature of Rocky McVay in black ink, written in a cursive style.

Rocky McVay
Executive Director

cc: O&C Executive Committee
David Barrows
Dick Prather