



February 7, 2006

Project Manager
National Vegetation EIS
BLM Nevada State Office
P.O. Box 12000
Reno, NV 89520-0006

Dear Bureau of Land Management:

1 Please accept these comments on the proposed draft "Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic EIS (PEIS) and Programmatic Environmental Report" on behalf of the members of the American Forest Resource Council (AFRC). AFRC is made up of approximately 80 forest products manufacturers and timber growing companies. Our mission is to promote sustained forest management on our federal lands. Many of our members have their operations in rural communities adjacent to federal forests, and the management on these lands ultimately dictates the health of the forest products industries in these areas and the economic health of the communities themselves.

2 The PEIS and Programmatic Environmental Report" (PER) suggests banning the use of herbicides on up to 5.1 million acres of public lands. AFRC strongly opposes the ban and urges you to adopt the Preferred Alternative B, "Expand Herbicide Use and Allow for Use of New Herbicides," for managing vegetation on BLM-managed lands.

3 The BLM states the need for the PEIS as a means for reducing the risk of catastrophic wildfire and improving the health of the nation's forests and rangelands. Alternative B would allow the proper use of the most effective herbicides for specific vegetation treatments on more acres. Herbicides may not be needed in a healthy wildlife environment where stress on an intact plant community is limited or infrequent. However, the introduction of invasive plants, too frequent fire, and drought can fragment desirable plant communities by areas dominated by invasive plants. The use of herbicides must be an option for any integrated vegetation treatment program.

4 Alternative B would also allow for the use of newer technology. The use of new herbicides, which are effective at lower use rates, will help to reduce the overall amount of herbicides applied to control weeds, build more resilient plant communities reducing the need for annual herbicide treatments, encourage growth of desirable fire retardant vegetation, and allow for improved rapid response to weed problems.

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AFRC strongly believes a national policy that disapproves herbicide use, restricts the use of inhibitor herbicides or prohibits all aerial application will severely hamper rehabilitation and improvement of BLM lands infested by invasive weeds. Consequently, limiting or stopping use of herbicides on BLM land will result in greater economic and ecological hardship for neighboring land owners (federal, state and private).

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AFRC strongly urges the BLM to support preferred Alternative B, combined with the use of aerial application and reject all other alternatives.

Thank you for the opportunity to comment. If you have any questions, please contact me at 503-222-9505.

Sincerely,

A handwritten signature in blue ink that reads "Tom Partin". The signature is written in a cursive style with a large, sweeping flourish at the end.

Tom Partin
President