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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 behalf of Boise Cascade on the proposed draft "Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic EIS (PEIS) and Programmatic Environmental Report." From our perspective as a sizeable log buyer in the West, we see negative, long-term impacts to timber supply when invasive species are not properly controlled or competing vegetation kills or slows the growth of planted seedlings. Decisions the BLM makes here will inevitably affect USFS policy. As a major timberlands owner in the West, the federal government has a big impact on the landscape, the future productivity of timberlands, and our future. Our employees need assurance there is a long-term timber supply to support their jobs. We need assurance there is a long-term timber supply to support our operations. We truly applaud your efforts. The new herbicides are very specific and effective. It is appropriate that you update your assessments.

2 The PEIS and Programmatic Environmental Report suggest banning the use of herbicides on up to 5.1 million acres of public lands. Boise Cascade 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. Perhaps it will not be the only option, but certainly it should be an available option.

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,

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build more resilient desired 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.

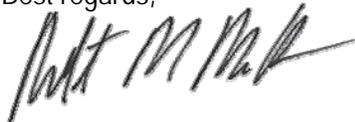
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Boise Cascade strongly believes that a national policy that disapproves herbicide use, restricts the use of inhibitor herbicides, or prohibits all aerial application will severely hamper rehabilitation and improvement of BLM lands infested by invasive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

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Boise Cascade strongly urges the BLM to support preferred Alternative B, combined with the use of aerial application and reject all other alternatives. The BLM has a huge impact on adjacent landowners when your land managers are not allowed the prudent use of herbicides.

Best regards,



Rob McNutt

RM/sf