



**LONE ROCK TIMBER MANAGEMENT CO.  
LONE ROCK LOGGING CO.**

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EMC0230

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Brian Amme  
Vegetation EIS Project Manager  
BLM  
P. O. Box 12000  
Reno, Nevada 89520-0006

Dear Mr. Amme:

1 Thank you for the opportunity to comment on the BLM's Programmatic Vegetation Treatment EIS currently under way. I would like to take this opportunity to support Alternative 2, the BLM's preferred alternative expanding herbicide use and allowing the use of new herbicides in western states.

2 Lone Rock Timber Management Company is a family owned forest management company with 115,000 acres in southwest Oregon. LRT has been in the forest industry for over 50 years utilizing emerging technologies to improve our business and forest environment. Controlling unwanted and noxious weeds is a major component of our silvicultural operations. We utilize a wide array of tools to achieve our objectives of maximizing the health and productivity of our forestlands. Herbicides are one of the tools we use due to their effectiveness, environmental and human safety, and cost.

3 The spread of noxious weeds from public lands to private lands is both an economic and environmental hardship. The existing road network necessary for forest management, recreation, and fire fighting can also be the conduit for the spread of weeds. The inability of public land managers to effectively and efficiently control noxious weeds along this road network allows for the continued spread of weeds to neighboring private lands. The spread of noxious weeds is not limited to the road network but routinely spreads to the adjacent forests and riparian areas negatively impacting forest and wildlife productivity on both public and private lands. Implementing the preferred Alternative 2 will increase the ability of local land managers in addressing the spread of noxious weeds thus improving the health and productivity of the landscape.

4 While several methods exist for treating and controlling noxious weeds (prescribed fire or manual treatment), herbicides are consistently the safest, most effective and least expensive method. A

4 cont large body of scientific evidence exists supporting the safety and effectiveness of the materials identified in Alternative 2. Most of these materials are commonly used on private lands providing ready access to available materials and a trained and licensed workforce able to implement the identified workload. These are some simple realities needed in order to meet the land management objectives—available materials and available contractors to do the work.

5 Public land managers are charged with the responsibility of managing and caring for a wide variety of outcomes. Professional experience has shown me in order to meet many objectives, many tools are needed. By implementing Alternative 2 of this Programmatic EIS, local land managers will be adding a much needed set of tools to their tool kit. As the spread of noxious weeds continues across the West, Alternative 2 represents a return to active responsible management of public lands through contemporary management techniques that will ultimately result in healthier more enjoyable lands.

Thank you for the opportunity to comment.

Sincerely,

*(s) Jake Gibbs*

Jake Gibbs

Management Forester