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February 10, 2006

EMC0541

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

RE: Draft Vegetation Treatments on BLM Lands – Programmatic EIS & Environmental Report

Dear Project Manager:

1 I am writing on behalf of Associated Oregon Loggers, Inc. [AOL], concerning the Bureau of Land Management [BLM] proposed *Draft Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic EIS [PEIS] and Programmatic Environmental Report*. **AOL urges the BLM to adopt Alternative B [Expand Herbicide Use and Allow for Use of New Herbicides], modified to incorporate our concerns.**

2 AOL represents more than 1,000 logging and allied forest member companies. These companies play a major role in management of private & public forests throughout Oregon— as contractors, purchasers and vendors of forest management services (operators). These Oregon forest management professionals employ approximately 10,000 workers. AOL member companies are stakeholders in conducting professional forestry of Oregon’s 7 BLM Districts with forestlands [2.5 million acres]. Furthermore, these companies manage adjacent non-federal forests, which are impacted by the quality or inferiority of management on BLM forests. Therefore, we have a valid stake in BLM forest productivity—today and in the future.

3 As the current BLM limited use of herbicides is unacceptable, we anticipate a policy revision that would promote expanded herbicide use. This policy revision would allow more effective forest management to address several key forestry problems, including: reforestation & stocking failures; increasing acreage of brush fields; deforested landscapes after catastrophic events; reforestation cost overruns; invasive species infection; catastrophic wildfire; reduced BLM forest productivity; unhealthy BLM forest conditions; long-term habitat impairment; less contribution to Oregon’s forest economy; and spread of these threats to neighboring non-federal property. Many project-level decisions become so unwieldy under the weight of ineffective herbicide policies, that BLM managers simply avoid using herbicides. These problems harmfully impact federal forest health, injure nearby non-federal property, and damage the economic & social viability of Oregon’s rural forest businesses and communities.

4 The existing regulations and guidance for herbicide use clearly obstruct the timely and scientifically-proven forest management actions—which are necessary to protect and sustain Oregon’s BLM forest resources. Current herbicide policies are outdated, are excessively costly, are inordinately cumbersome, discourage/prohibit managers from herbicide use, and are unmistakably harmful to the environment.

5 Current management of BLM forests without herbicides is *not* sustainable from either an economic, social, or an environmental basis. Because AOL member companies favor sustainable communities and landscapes, we offer several recommendations concerning your Draft Report. AOL supports the BLM's Draft PEIS to modernize and improve the antiquated herbicide policy; however, we urge the PEIS project team to please consider the following concerns to modify Alternative B:

- 6 1. AOL opposes the ban of herbicides use on up to 5.1 million acres, and urge you to adopt a modified Alternative B, PEIS and Programmatic Environmental Report, "Expand Herbicide Use and Allow for Use of New Herbicides," for managing vegetation on BLM-managed lands. We urge you to modify Alternative B to incorporate our concerns.
- 7 2. Alternative B would allow improved use of the most effective herbicides for specific vegetation treatments on more acres. 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. 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.
- 8 3. Alternative B would also allow accommodate technology improvements. The proposed policies should allow use of new EPA-approved 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. Additionally, improved application methods & timing should be left to local managers, rather than prescribed in a national plan as one-size-fits-all.
- 9 4. Herbicides are a tool for reaching desired forest conditions. Herbicides are necessarily a function of active management, and therefore should not be unduly prohibited by unfounded/unnecessary national management direction.
- 10 5. Decisions to use herbicides should demonstrate the "balance-of-harms concept." Herbicide use often has relatively minor short-term effects that are very acceptable to accomplish far greater long-term benefits. Herbicide policy must demonstrate a bias for common-sense, rather than fear & hype over today's unfounded or presumed risks. Risk-aversion at all costs is truly a flawed strategy that's inconsistent with long-term land management.
- 11 6. Herbicide use is a vital tool to cost-effectively act to promptly recover forests damaged by catastrophic events. Greater legal sufficiency for herbicide use is necessary for timely action that recovers damaged or killed forests. Forests should be promptly reforested, ecosystems restored, valuable products marketed, regional/local economies are supported, local communities are benefited, and fire-pest-disease hazards are abated. The patent waste of deforestation and damaged habitat caused by neglected wildfires and pest outbreaks, poor site preparation, failed reforestation in the BLM forests over the past 15-years is unconscionable—and must not continue.

- 12 7. Herbicide use must be an available tool to direct rapid establishment of reforestation, and “free-to-grow” status, after any harvest or stand damage. The current BLM reforestation backlog of poorly-stocked stands is abysmal, in part due to unnecessary herbicide use obstacles. This problem must be corrected to accomplish forest sustainability. Such a backlog is illegal for non-federal forest landowners in Oregon. Why do BLM managers blatantly disregard Oregon reforestation law? You might not be aware that the Oregon Forest Practices Act requires any landowner [including BLM] to reforest stands to “free to grow” standards within six years of completion of commercial activities, when stocking levels drop below legal standards. [Refer to ORS 527.745 and OAR 629-610-0000 to 629-610-0090]. While the BLM seldom harvests many burned areas, nonetheless commercial activities do occur across these burned forests—which might be construed as commercial [such as a single tree planting, fireline construction, contract firefighting, erosion control, riparian improvement, or grass seeding].
- 13 Far too many acres of BLM forest remain poorly regenerated after stand disturbances [wildfires] occurring over the past 1-2 decades. Lack of herbicide use contributes to seedling survival problems, seedling predation, or competitive vegetation that precludes seedlings from achieving “free to grow” status. Where such reforestation backlogs occur, the future forested capacity is compromised—so that future forests would not provide the desired suite of resource benefits that were otherwise available from a fully stocked forest stand.
- 14 8. Herbicide use & application warrants different/special consideration within “wildland-urban interface zones” AND “ownership perimeter zones”, located near BLM forest boundaries [1-2 miles]. Such “ownership perimeter zones” would address the forest protection values of adjacent non-federal landowners [wildfire, pests, invasives, etc], and the impact of lacking BLM management on these neighboring non-federal lands. There are significant private timberland holdings in Oregon’s alternating BLM sections in the checker-board O&C ownership. Wildfire and pest hazards on BLM forests are a clear & present danger to neighboring non-federal lands. These BLM “perimeter areas” should be placed into a category that allows application of a full array of management tools—including full use of the array herbicides and application methods.
- 15 9. Consistent with BLM forest management goals, forestry should include a full array of herbicide use [including aerial applications] to minimize the effects of catastrophic forces such as: wildfire, diseases, and invasive species.
- 16 10. The PEIS should consider that BLM forest plans include a desired condition that promotes healthy forest stands that are resistant and resilient to pests, diseases, wildfires and storms.
- 17 11. Economic and social role of future BLM timber is vital. The contribution of herbicides to future forest productivity, and sustainable timber harvest volume, is necessary to fulfill the community obligation of the O&C Act—for Western Oregon BLM forestlands.
- 18 12. Disparage the prescriptive obstacles of previous herbicide decisions, which hobbled action. Previous herbicide policies that dictated overly-specific silvicultural applications must be avoided. Limiting management options by edicts, such as herbicide bans, is nonsensical. This BLM revision needs to clearly explain that herbicide use for regeneration, and prompt young forest establishment *must* be an integral practice supported by the plan revision.

19 A BLM national policy that either prohibits or restricts herbicide use [including bans on aerial application] would severely hamper the sound forest practices needed to sustain healthy BLM forests & rangelands. Barring herbicides on BLM lands impedes BLM productivity, as well as spreading threats to neighboring non-federal land owners. Furthermore, limiting or stopping use of herbicides through national one-size-fits-all edicts on BLM lands would result in economic and ecological hardship for neighboring properties and the rural resource communities reliant on federal forest productivity. Current BLM herbicide policy is simply bankrupt—and must be quickly improved!

20 AOL strongly urges the BLM to support Alternative B, modified to incorporate our concerns expressed above. Please reject all other alternatives. Thank you for the opportunity to comment about the proposed Draft Vegetation Treatments on BLM Lands PEIS. Please ensure that the Vegetation PEIS team fully considers our comments.

Sincerely,
/s/ **Rex D. Storm**
Rex Storm, CF
Forest Policy Manager
Associated Oregon Loggers, Inc.