Giustina Land & Timber Co.

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December 21, 2005

Mr. Brian Amme
PEIS Project Manager
Nevada State Office
1340 Financial Boulevard
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme: RE: Programmatic EIS Comments

1 I appreciate the opportunity to comment on the proposed alternatives analyzed under the *"Draft Programmatic Environmental Impact Statement on Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States"* and the accompanying *"Draft Programmatic Environmental Report."* I am writing to express support for the Bureau of Land Management's Preferred Alternative (Alternative B - Expand Herbicide Use and Allow for Use of New Herbicides in 17 Western States).

2 Both science and professional experience have taught me that effective control of noxious and invasive weeds cannot be accomplished passively. Active forest management, prescribed by professional foresters, can achieve and maintain healthy forests consistent with federal land management objectives. Active forest management must be efficient and flexible in order to provide local land managers all the necessary tools to control these weeds. Alternative B begins to provide these local decision makers the integrated tool set necessary to adequately control these weeds while remaining efficient and flexible.

3 With over 6.4 million acres infested, Oregon has the third highest level of weed infestation on public lands out of all of the 17 western states. As a forester in Oregon's private sector, it is important to point out that the infestation of private lands from adjacent public lands has become both an environmental and financial challenge. This problem is particularly evident along Right-of-Ways, where vehicular traffic and other disturbance have aided in the spread of various weed species onto private land. Consequently, the lack of adequate control along public Right-of-Ways has progressed into access and public safety issues in many situations.

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4 In addition, invasive and noxious weeds have begun to challenge the ecological integrity of sensitive riparian areas. The lack of active weed control on public land has forced changes in the riparian plant communities along downstream private lands, forcing private landowners to seek out non-traditional and often more expensive means of control. Alternative B increases the number of acres treated in Oregon over the next decade, working toward a more realistic level of control for noxious and invasive weeds along Right-of-Ways and other ecologically significant areas.

5 To ensure safe use, the federal government regulates pesticide use under the Federal Insecticide, Fungicide and Rodenticide Act. This act requires all pesticides to be registered by the U.S. Environmental Protection Agency (EPA). As congressionally directed, the EPA has the responsibility of assessing the effects of pesticide use on environmental and public health before registering it for use. A real strength of Alternative B is in its forward-thinking nature; by allowing the future use of safer pesticides with superior modes of action and selectivity as they become registered by the EPA.

6 The rapid infestation of noxious and invasive weeds continues to be a challenge throughout the West. Alternative B will empower local Bureau of Land Management personnel to more aggressively meet this challenge.

Thank you for the opportunity to comment.

Respectfully submitted,

Eric Kranzush
Forest Manager

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