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February 8, 2006

Mr. Brian Amme,  
Project Manager  
Bureau of Land Management  
P.O. Box 12000  
Reno, NV 89520-0006

Dear Mr. Amme:

The Society of American Foresters (SAF) is pleased to offer comments on the proposed *Vegetation Treatments Using Herbicides on Bureau of Land Management lands in 17 Western State Programmatic EIS*. SAF, an organization of over 15,000 professionals in all segments of the profession, is concerned with the declines in forest health and increasing wildfire threats on federal forest lands which pose risks to public safety, communities, as well as the long-term health and resiliency of the associated forest resources. Because of this concern, SAF supports BLM's preferred alternative, Alternative B, *Expand Herbicide Use and Allow for Use of New Herbicides*.

SAF strongly supports the judicious use of herbicides in forest management as part of an integrated vegetation management strategy. Herbicides registered by the U.S. Environmental Protection Agency (EPA) in compliance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and applied according to label directions and federal and state regulations are an environmentally safe option for managing undesired vegetation.

The BLM's proposal to expand herbicide use and permit the use of new herbicides will assist in reducing the risk of catastrophic wildfires and promote and restore healthy forests and rangelands. Herbicides, applied properly are an essential tool for the BLM in their quest to control hazardous fuels and unwanted vegetation.

The use of herbicides may not be required or desired in certain areas, and the decision to apply herbicides should be made locally based on the vegetation and other site characteristics and desired management goals. This PEIS provides the basic scientific information that can be tiered to local land management decisions. Additionally, this PEIS provides the BLM with the flexibility to consider different treatments locally, including herbicides and/or mechanical treatments, prescribed fire, and other tools.

SAF applauds BLM's efforts to respond to the President and Congress's mandates to implement the National Fire Plan, The Healthy Forests Initiative and the *Healthy Forests Restoration Act of 2003* by taking more aggressive actions to reduce catastrophic wildfire risk on public lands.

Thank you for the opportunity to comment on this issue of importance to a large expanse of federal forests and rangelands in the west.

Sincerely,

Michael T. Goergen, Jr.  
Executive Vice President, CEO