



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON D.C. 20548

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Irwin

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CED 2-14

October 19, 1981

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The Honorable James H. Weaver
Chairman, Subcommittee on Forests,
Family Farms, and Energy
Committee on Agriculture
House of Representatives

Dear Mr. Chairman:

In response to your October 7, 1981, letter we are providing our views on the proposed bill for forestland vegetation management. This bill would, among other things, promote forestry employment and the safe use of herbicides on public forest lands managed by the Department of Agriculture's Forest Service and the Department of the Interior's Bureau of Land Management. The following comments are based primarily on our review of the Service's and Bureau's use of herbicides in their vegetation management programs and our recent report entitled "Better Data Needed To Determine the Extent to Which Herbicides Should Be Used on Forest Lands" (CED-81-46, Apr. 17, 1981.)

In our review we concentrated on the agencies' vegetation management activities at two forest management stages: site preparation and release. (The term release refers to promoting the growth of selected trees by temporarily suppressing competing vegetation.) It is at these stages in managing a forest that herbicides are generally used. The proposed legislation would require the Service and the Bureau to institute stricter guidelines on the use of herbicides in their vegetation management programs and, as we recommended in our report, would require them to obtain better information before deciding on treatment and the method of treatment.

Section 3 of the proposed bill requires site-specific determinations of the need for vegetation management practices. However, as stated in our report (CED-81-46) and discussed in our comments on H.R. 2900, copies enclosed, information gaps exist on both the cost and the relative effectiveness of various options available to carry out site preparation and release work. A particular concern is that, in those forests and districts relying heavily on herbicides, the decision-makers do not have

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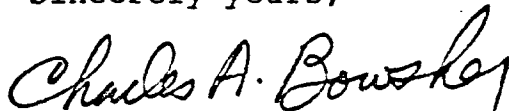
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adequate empirical data on the nonherbicide alternatives, thereby making meaningful comparative analyses difficult or impossible. It was the aim of a recommendation in our report that those forests and districts relying heavily on herbicides should do more to test the use of nonherbicide methods to rectify this data base deficiency. We continue to believe that this aim has merit and suggest that such a requirement be included in Section 3. Ascertaining which vegetation management practice to use is a natural adjunct to, and equally important as, the initial determination of the need for vegetation management.

Because this bill represents proposed new legislation rather than amendment of existing legislation, you may wish to add a section authorizing the issuance of regulations and rules necessary to implement its provisions.

We have no comments on the other sections of the proposed bill.

Sincerely yours,



Comptroller General
of the United States

Enclosure