



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

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June 19, 1981

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 May 27, 1981, letter we are providing our views on H.R. 2900, the proposed Vegetation Management Reform Act of 1981, introduced on March 26, 1981. 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) (copy enclosed). 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 when herbicides are generally used.

GENERAL COMMENTS

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. The bill's promotion of forestry employment would be in line with and would strengthen the Forest Service's own pesticide policy statement. As noted in our report, the Service's current policy statement issued in October 1979 states in part that in considering alternatives:

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"High priority should be given to the utilization of employment opportunity programs and other opportunities to create jobs."

The bill is directed at the forest management activities of the Department of Agriculture and the Department of the Interior's Bureau of Land Management. Other Federal departments and agencies also manage forest land. These include the Department of Defense and three other Interior agencies--the Bureau of Indian Affairs, the National Park Service, and the Fish and Wildlife Service. Although we did not review their vegetation management activities and do not know the extent to which they may use herbicides, you may wish to consider whether the bill should also apply to these other entities.

Because this bill proposes new legislation, you may wish to add a section authorizing the issuance of regulations and rules necessary to implement its provisions. The remainder of our comments are organized to follow the sequence established by the bill.

PROMOTE FORESTRY EMPLOYMENT
AND COST EFFICIENCY

Sections 1 and 2 direct the Secretaries to give preference to each of two different and potentially conflicting objectives. Section 1 states that preference shall be given to those methods for controlling undesired vegetation that yield the maximum number of jobs per dollar expended for this purpose. Section 2 states that preference shall be given to vegetation management practices that are the most cost-efficient for the unit of land under consideration. Unless the bill's language in section 1 and 2 is clarified to establish which section has precedence over the other, it appears conflicts could arise.

Although the cost data gathered at the national forests and Bureau districts we visited could not be used for a definitive analysis of vegetation management by the different methods the data does demonstrate potential conflicts that could arise between the two sections. Over a 5-year period (1975-79), direct site preparation and release costs per acre were generally less for aerial herbicide spraying than for ground herbicide or manual methods. Yet the latter methods, which are more labor intensive, would most likely yield more jobs per dollar expended.

COST ANALYSIS REQUIREMENT

Section 2 states that vegetation management practices that are the most cost-efficient shall be given preference and that cost-efficiency determinations shall be made for each vegetation management alternative considered, calculating all direct and indirect costs. Our review showed that the agencies do not have adequate data to implement this section and will not be in a position to do so until the recommendations in our report (CED-81-46) are implemented.

As we reported, major information gaps existed on the actual costs of using the various methods; the costs relating to differences in site characteristics, such as access to area and volume of competition; and the results of practical application and experience, including successes and failures, of using alternatives and in many cases herbicides. We also noted that the agencies generally did not make detailed cost comparisons or analyses nor keep records to track indirect costs associated with the various vegetation management practices.

We concluded among other things that to help fill the major information gaps on the cost and relative effectiveness of options available to carry out site preparation and release work, the use of nonherbicide methods should be increased and steps should be taken to gather more site-specific pretreatment and post-treatment information, including cost data. Specifically, we recommended that the Secretaries of Agriculture and the Interior instruct the Chief of the Forest Service and the Director of the Bureau, respectively, to:

- Ensure that those forests and districts relying heavily on herbicides increase the use of nonherbicide methods.
- Ensure that adequate site-specific pretreatment and post-treatment information is gathered and evaluated.
- Gather more comprehensive and complete cost data on their site preparation and release projects.

Accordingly, you may wish to revise H.R. 2900 incorporating these recommendations as requirements in section 2 or 3.

SITE-SPECIFIC INFORMATION BEFORE TREATMENT

Section 3 would require the agencies to gather better and more data before beginning treatment of competing vegetation. Our report supports the need for more objective criteria for determining the need for release and the need for more site-specific pretreatment and post-treatment information.

As we pointed out, the initial decision about the need for release at the forests and Bureau districts we visited was generally based on a "site prescription"--a detailed document which may be prepared as much as 6 years before the release is actually performed. The ultimate decision to release and the choice of method(s) to use are usually based on a visual examination of the stand to be treated and a judgment as to whether it is being suppressed or is going to be suppressed. Also, none of the Bureau districts or Service forests we visited consistently gathered or documented site specific pretreatment and post-treatment information or consistently evaluated the various treatment methods used. We said that such information is needed so that management can not only evaluate its decisions but also compare successful projects with failures to determine why particular methods work in some areas but not in others.

In addition to the recommendations mentioned on page 3 relating to site-specific information, we also recommended that the Secretaries instruct the agency heads to develop more objective criteria for determining the need for release.

SUSPEND USE OF REGISTERED HERBICIDES WHEN
REQUESTS FOR NEW INFORMATION ARE MADE

Section 6 would require the Secretaries to suspend using a registered herbicide if the Environmental Protection Agency (EPA) requested new information in order to determine its continued safe use. This section may be unduly restrictive because when EPA requests health and safety studies, it does not necessarily mean that the pesticide poses unreasonable risks. For example, EPA's requests to fill data gaps because of reregistration are not always based on a suspicion of unwarranted health risks. Therefore, we believe this section should be revised to more clearly

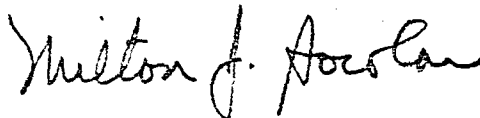
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state the conditions that would trigger a pesticide suspension by the Secretaries of Agriculture and Interior.

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We have no comments on sections 4 and 5.

Sincerely yours,



Acting Comptroller General
of the United States

Enclosure