



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
WESTERN REGION
P.O. Box 10
Phoenix, Arizona 85001



IN REPLY REFER TO:

Environmental Quality Services
File 4301.15
(602) 379-6750

FEB 14 2006

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

Re: Draft Programmatic Environmental Impact Statement, Vegetation Treatments
Using Herbicides on Bureau of Land Management Lands in 17 Western States

Dear Mr. Amme:

- 1 The Bureau of Indian Affairs (BIA), Western Regional Office has reviewed the Draft Programmatic Environmental Impact Statement (PEIS) for the above-referenced project and offers the following comments for your consideration.
- 2 We understand from our review that BLM's preferred alternative, Alternative B (Expand Herbicide Use and Allow for Use of New Herbicides in 17 Western States), poses the most overall risk to cultural resources and human health of all of the alternatives that have been analyzed. This alternative may directly impact cultural resources near or on the surface where herbicide treatments occur, from both chemicals in the herbicides and increased equipment activity on the ground. We also understand this alternative may have direct impacts on vegetation that are consumed and used for Native American traditional lifeways and subsistence (such as gathering, basketmaking and other purposes), and may pose health risks to Native Americans where herbicide treatment occurs. The EIS discloses that these impacts may depend on the herbicide treatment type and method of application.
- 3 BIA, Western Regional Office understands that consultation activities in accordance with the National Historic Preservation Act (NHPA) will occur prior to application of herbicides for vegetation treatment, and appreciates BLM's disclosure that NHPA compliance activities will occur before proceeding with vegetation treatments. Consultation and outreach efforts on this issue should be extensive and thorough, to allow for ample opportunity for Native American tribes to understand completely the reasons for treatment, the herbicide use and its direct potential affect(s) on vegetation, cultural resources, and health. Project specific mitigation should be developed for these purposes that incorporate Native American consultation efforts.

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Additionally, although the EIS relays that beneficial results, including the reduction of wildfire risk and reduction or elimination of non-native or invasive plant competitors, can be achieved from application of herbicides, and appears to be the overwhelming goal of the analysis presented in the EIS, we encourage careful consideration of the health and public safety risks of neighboring tribal and surrounding communities in the planning efforts for these vegetation treatment projects.

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We appreciate the opportunity to comment on this PEIS and your consideration of our comments. If you have any questions, please feel free to contact Ms. Amy Heuslein, Regional Environmental Protection Officer, at 602-379-6750.

Sincerely,



Acting Regional Director

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