



PUBLIC LANDS ADVOCACY

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Brian Amme, EIS Project Manager
Nevada State Office
Bureau of Land Management
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RE: Programmatic Environmental Report (PER) For Vegetation Treatment on Bureau of Land Management Lands and Programmatic Environmental Impact Statement (PEIS) for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States

Dear Mr. Amme:

1 On behalf of Public Lands Advocacy (PLA), following are comments on the recently released PEIS on Vegetation Treatments. PLA is a nonprofit trade association whose members include independent and major oil and gas producers, as well as nonprofit trade and professional organizations, which have joined together to foster environmentally sound exploration and production on public lands.

2 While we recognize the intent of the subject analysis was to identify suitable herbicides for use on public lands, we are concerned that BLM failed to analyze the impacts of this new program on the oil and gas industry. Even though in sum the petroleum industry impacts a small percentage of federal lands, consideration of these activities must be included in any analysis. Specifically, it is unclear how the new vegetation program will impact current and future exploration, development and reclamation operations. Therefore, we recommend that a new analysis directed at assessing impacts on these activities be included in the final EIS. Specifically, we the following concerns should be addressed:

- 3 | • Air quality impacts from vegetation treatments and their affect on oil and gas operations
4 | • How oil and gas operations will be managed while vegetation is being re-established

5 Barring any unforeseen impacts that may arise from the additional analysis recommended above, PLA supports implementation of Alternative B – Expand Herbicide Use and Allow for Use of New Herbicides in 17 Western States. This alternative gives BLM the flexibility needed to manage vegetation resources through a variety of means and provides for active monitoring of their uses to ensure their efficacy.

6 We appreciate this opportunity to provide you with our comments and concerns.

Sincerely,