



# ANIMAL WELFARE INSTITUTE

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January 6, 2006

BY TELEFAX OR ELECTRONIC MAIL

Ms. Kathleen Clarke, Director  
Bureau of Land Management  
1849 C Street, NW  
Washington, DC 20240

Mr. Brian Amme  
Vegetation EIS Project Manager  
Bureau of Land Management  
P.O. Box 1200  
Reno, NV 89520-0006

Dear Director Clarke and Mr. Amme:

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On behalf of the Animal Welfare Institute (AWI), I am writing to request that the Bureau of Land Management provide a 60-day extension in the deadline for comments on the Programmatic Vegetation Treatments Environmental Impact Statement, Programmatic Environmental Report, and associated documents (hereafter Vegetation Treatments Environmental Documents). If granted, this request would extend the comment deadline from January 9, 2006 to Thursday, March 9, 2006.

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The AWI believes this request is justified and should be granted for the following reasons:

1. The Vegetation Treatments Environmental Documents evaluate the environmental impacts of using herbicide and non-herbicide treatments on lands administered by the Bureau of Land Management in 17 western states. In other words, the proposed project represents a massive federal action with potential impact, beneficial and adverse, throughout a significant portion of the United States. The current 60-day comment period is simply insufficient to afford the public, including special interest groups like the AWI, the time needed to formulate informed and substantive comment in response to the Vegetation Treatments Environmental Documents.

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2. The Vegetation Treatments Environmental Documents, including the associated documents such as the Human Health Risk Assessment, Draft Biological Assessment, Ecological Risk Assessment Protocol and Assessment consist of over 1,000 pages of information and analyses. The sheer amount of information contained in the Vegetation Treatments Environmental Documents necessitates a 60-day extension in the comment period to ensure that the public, including interest groups, have adequate time to fully review, understand, and evaluate the information and analyses contained in the Vegetation Treatments Environmental Documents.
3. The subject matter dealt with in the Vegetation Treatments Environmental Documents, particularly the Programmatic Environmental Impact Statement on using herbicides on lands administered by the Bureau of Land Management, includes an analysis of the potential impacts, beneficial and adverse, of various chemicals on the biotic environment. The technical nature of this analysis requires additional time to afford the public, including interest groups, the opportunity to engage in supplementary research, when necessary, to verify the accuracy of the analysis of herbicide impacts on target and non-target vegetation, wildlife, protected species, air quality, water quality, and human health. To provide this opportunity, a 60-day extension in the comment deadline is clearly needed.
4. Extending the comment period as requested will benefit the Bureau of Land Management by ensuring that the public, including interest groups, are able to submit informed and substantive comments which will aid the Bureau of Land Management and its decision-makers in making a final decision based on a full understanding of potential impacts (beneficial and adverse) and with sufficient public involvement in the process.

For the foregoing reasons, the AWI requests that the January 9, 2006 comment deadline on the Vegetation Treatments Environmental Documents be extended to March 9, 2006.

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Thank you in advance for considering this request. I look forward to receiving notification of your decision on this matter at your earliest convenience either by telephone (609-334-1378) or e-mail ([dj@awionline.org](mailto:dj@awionline.org)).

Sincerely,

*D.J. Schubert*

D.J. Schubert  
Wildlife Biologist