



# United States Department of the Interior

U.S. GEOLOGICAL SURVEY  
12201 Sunrise Valley Drive  
Reston, VA 20192

In Reply, Refer to:  
MS 953  
GS13000198

Rear Admiral William S. Stokes, Director  
National Toxicology Program Interagency Center  
for the Evaluation of Alternative Toxicological Methods  
National Institutes of Health  
National Institute of Environmental Health Sciences  
P.O. Box 1223  
Research Triangle Park, NC 27709



Dear Rear Admiral Stokes:

In a letter dated September 19, 2012, to Secretary of the Interior, Mr. Kenneth Salazar, Dr. Linda S. Birnbaum of the National Institutes of Health requested Departmental review of the "Interagency Coordinating Committee on the Validation of Alternative Methods Test Method Evaluation Report: Identifying Chemical Eye Hazards with Fewer Animals". As requested by Dr. Birnbaum, the U.S. Geological Survey (USGS) is responding on behalf of the Department of the Interior directly to you.

This document was reviewed and commented upon by USGS scientists, and found to be well-written and scientifically-robust. The comparisons among the three strategies for reducing the number of animals are disciplined and straightforward. Adoption of the 3-animal test appears to detect potential eye hazards associated with a chemical or product equivalent to the current test procedures that can require the use of up to 18 animals. The document provides a humane alternative to current testing methods that should be put into practice as soon as possible.

Please note that our Department conducts ecotoxicological research and monitoring of fish and wildlife, and has very limited regulatory authority for chemicals and pharmaceuticals. The Department of the Interior continues to support new methods and strategies that reduce the number of test animals in such evaluations, and will alert Institutional Animal Care and Use Committees at our research facilities about these new procedures. We are pleased to assist in such reviews, and will gladly provide in depth comments on those test methods that are more closely allied to our mission.

Sincerely, */s/*

David P. Russ, Regional Director Northeast Area  
U.S. Geological Survey