



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 30, 2006

Planning Team
Arizona Strip District
345 East Riverside Dr.
St. George, UT 84790

Subject: Draft Environmental Impact Statement for the Arizona Strip Field Office, the Vermilion Cliffs National Monument, and the Grand Canyon-Parashant National Monument, Arizona (CEQ #20050521)

Dear Planning Team:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The project is a management plan that provides direction for the Bureau of Land Management (BLM) and the National Park Service (NPS) for the new Grand Canyon-Parashant and Vermilion National Monuments, established by Presidential Proclamation in 2000. It also revises the resource management plan for BLM's Arizona Strip Field Office. Alternative E is the preferred alternative, and is also identified as the environmentally preferable alternative.

Based on our review, we have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). We have concerns regarding impacts from increasing Off-Highway Vehicle (OHV) use coupled with cumulative impacts due to explosive growth rates on the Arizona Strip. We have several suggestions for changes to the preferred alternative that, if adopted, would better fit the description of environmentally preferable alternative.

We commend the BLM and NPS for a well-written programmatic document. Because of the large geographic area and complexity of issues, the analysis would have been clarified with the use of tables including available quantitative information for each resource evaluated in Chapter 4. While this information was often in the Alternatives section, including it in a summary table in the environmental consequences section would have enabled an easier comparison of alternatives. The summary of impacts in Table 2.19 rarely included quantitative information.

The comprehension and comparison of alternatives was greatly facilitated, however, by the excellent collection of maps that were included. In addition, the cumulative impacts discussions were well located at the end of each resource section, as well as in a separate

discussion at the end, and provided a good concise picture of future trends for the resources of the Arizona Strip.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3988 or Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/s/

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosure: EPA's Detailed Comments
Summary of EPA Rating Definitions

Roads and Travel Management Areas (TMAs)

The DEIS documents well the impacts from roads and Off Highway Vehicles (OHVs). These impacts include: impacts to soils from compaction and increased erosion, resulting in sedimentation of water resources (p. 4-18); impacts to vegetation from dust, crushing and noxious weed invasion (p. 4-60); impacts to fish and wildlife from loss, alteration and fragmentation of habitat, disturbance from noise and dust, and death by collisions (p. 4-94); and impacts to cultural resources from increased access, damage and vandalism (p. 4-158).

Cross-country OHV use in open areas, compared to use limited to designated and existing roads, has the potential to cause the greatest amount of direct impacts to water quality in terms of erosion and runoff (p. 4-19). The Preferred Alternative E would open nearly 9 times more acres of public lands to this use, increasing the potential for impacts to water resources (p. 4-27, 29). In addition, two of the Areas of Critical Environmental Concern (ACEC), Ft. Pearce ACEC and Little Black Mountain ACEC, are surrounded by the OHV event area, and appear directly adjacent to the open OHV cross-country area in Preferred Alternative E (Map 2.43). In contrast, the open areas designated in Alternative C are not adjacent to ACECs and would provide a buffer for protection of soils, water resources, cultural resources, and wildlife, while still providing open access recreation.

Recommendation:

We recommend the preferred alternative be changed to eliminate open motorized and mechanized cross-country travel due to the substantial impacts from this activity on soils, water resources, cultural resources, and wildlife. If open OHV areas must be designated, EPA recommends BLM adopt the open acreage of Alternative C, which is 5 times less than under the Preferred Alternative E (p. 4-44). This selection still allows for open recreation and is a substantial increase from the current 803 acres open on BLM lands (p. 2-189). Allowing a buffer between open areas and the ACECs is more protective of soils, biological and cultural resources, especially for the Ft. Pearce ACEC which has highly erosive saline soils (p. 3-180).

We support the Off-Highway Vehicle (OHV) designation of the preferred alternative that limits access to designated roads and trails (as opposed to existing roads and trails). The motorized speed event area on 151,161 acres would provide for recreational needs, but would also accentuate impacts to resources. While we understand the increased recreation demands, we are concerned with these impacts and recommend additional mitigation in relation to roads and in the form of increased protection in other portions of the Planning Area.

Recommendation:

To help mitigate the impacts from the OHV event area as well as the OHV open cross-country area(s) if designated, we recommend the following road-related changes to the

preferred alternative:

- All roads in the Monuments should be designated “MO” – open to motorized/mechanized travel by the public, but having special mitigating measures designed to ensure Monument objects or sensitive or important resources are protected.
- Future route designations made in the St. George subregion (2-194) should avoid the area having wilderness characteristics located on Map 2.44.
- New permanent road construction in Vermilion should be specified as under Alternative C (minimum necessary to achieve Plan provisions) (2-198).

The following additional protections to other BLM lands on the Arizona Strip are recommended:

- Designate the Travel Management Areas (TMAs) in the preferred alternative as identified under Alternative C, which emphasize more “Outback management units” in the south and west. These designations are consistent with the emphasis of the preferred alternative to minimize human influence and use in the southern and more remote sections of the Planning Area.
- Manage more land in the Monuments for wilderness characteristics closer to the allocations listed for Alternative B.
- Designate additional ACECs, such as the Lime Kiln/Hachet Canyon and Grey Points ACEC (2-69).
- Designate the Marble Canyon ACEC boundary as indicated under Alternative D instead of E, for protection of an endangered cactus, raptors, and scenic values.

Additional Protections for Desert Tortoise

The DEIS notes that the Desert Tortoise Recovery Plan found that unpaved and paved roads, trails and tracks have profound impacts on Desert Tortoise populations and habitat (4-124). The DEIS indicates that construction of new unpaved roads would only be authorized in ACECs if positive benefits would result for desert tortoise or their management (2-216). The DEIS does not indicate what positive benefits new roads could provide to tortoise. The DEIS also indicates that roads impact vegetation and many special status species have a low tolerance for change, such that even small modifications to vegetation in their environment can lead to pronounced effects on the species (p. 4-120).

We commend BLM for enlarging the Beaver Dam and Virgin Slope ACECs by 787 and 275 acres respectively for the protection of the Desert Tortoise (2-211). However, the Virgin River Corridor ACEC, which was modified in 1998 to include protection of Desert Tortoise, is being reduced by 6,012 acres to include only the floodplain and managed only for fishes and not tortoise. It is not clear why this was included in the preferred alternative.

Recommendation:

In the FEIS, provide information on how new roads can positively benefit the Desert Tortoise. Provide the rationale for eliminating protections of the Desert Tortoise in the Virgin River Corridor ACEC in the preferred alternative. If suitable habitat exists in this area, we recommend retaining more acreage in the Virgin River Corridor ACEC for the protection of Desert Tortoise.

Because of the known impacts of roads on Desert Tortoise, we recommend the following additional mitigation measures be included as part of the preferred alternative:

- New permanent roads should not be constructed in the Desert Tortoise critical habitat in Parashant Monument, as identified on Map 3.20.
- Road closures should be more consistent with Alternative B (Map 2.11) in the Pakoon critical habitat area (Map 3.20).
- TMA designations in the Pakoon critical habitat area (Map 3.20) should be more reflective of Alternative B, which allocates these areas as Primitive TMAs.
- The utility corridor in tortoise habitat should be designated as for Alternative B (1/2 mile wide at Beaver Dam Slope ACEC).

Water Resources

We commend the BLM for designating the Kanab Creek ACEC in the preferred alternative, which will help maintain and possibly improve water quality in the Kanab Creek area (p. 4-24).

As mentioned above, the preferred alternative would reduce the Virgin River Corridor ACEC by 6,012 acres. The DEIS indicates that reducing the Virgin River Corridor ACEC to include only the 100-year floodplain, “would limit the protection of water resources and potentially increase the amount of impacts to water quality and quantity in the Virgin River” (p. 4-24).

Recommendation:

Consistent with our recommendation above in relation to Desert Tortoise, we recommend that BLM decrease the reduction of the Virgin River Corridor ACEC in the preferred alternative for the benefit of water quality and quantity in the Virgin River, especially since the Virgin River will experience cumulative impacts from rapidly-increasing development in this area. The area south of Interstate 15 corresponds with the area to be managed for wilderness characteristics under the preferred alternative (Map 2.44). BLM should consider retaining this acreage in the ACEC.

Cumulative Impacts and Public Lands

The cumulative impacts analysis was effective in envisioning changes expected for the Arizona Strip. While sparsely populated, the area is experiencing explosive growth rates. Washington

County, Utah and Clark County, Nevada, both adjacent to the Planning Area, are poised to become major urban areas (p. 4-362). St. George recently became an urban area and Mesquite, Nevada is one of the fastest growing communities in the country. Dramatic increases in population are expected and being planned for with new highway developments. Community expansion will contribute to additional use of public lands. Development of large blocks of Arizona state trust land for residential, commercial, urban and community expansion will shift recreation from those lands to adjacent ones in the Planning Area (p. 4-291).

Cumulative impacts associated with such a dramatic increase in population call for a rigorous protection of public lands. The DEIS notes that since 1992, approximately 117 acres of public lands have been leased and 300 acres sold for development, and 112 acres were conveyed out of federal ownership for the Colorado City Airport, with expansions being considered (p. 3-117). The preferred alternative designates up to 25,319 acres of public land for exchange or sale.

Recommendation:

We recommend the preferred alternative adopt the land disposal acreage for the Arizona Strip Field Office as listed under Alternative A, the No Action Alternative: 7,335.45 acres available for exchange or sale, with exchange a priority, and an additional 17,853.47 acres available for exchanges only (p. 2-119). Sales of public land should be mitigated with acquisitions and/or increased protections for remaining lands.

Noise Impacts

The DEIS does not substantially discuss non-aviation related noise impacts nor does it fully evaluate OHV-related noise impacts for the alternatives. The mission statement for Parashant emphasizes preservation of natural quiet in wilderness and other remote settings (1-10), but this is not reflected in the Desired Future Condition (DFC) which is the same for all planning areas.

The DEIS states that vehicular events have the greatest potential to affect wildlife, particularly if species are rearing young (p. 4-103). It is assumed that noise from OHVs contributes to this impact; therefore related mitigation measures should be included.

Recommendation:

More discussion of noise impacts for the alternatives, especially related to OHVs, should be included in the FEIS. To correspond with the Parashant mission statement, a more rigorous DFC should be explicated for Parashant in Table 2.9 – Soundscapes. This DFC should also apply to all noise sensitive areas in the Planning Area, which page 2-111 defines as all statutory wilderness areas, National Monuments, and all areas allocated to maintain wilderness characteristics.

Noise mitigation should be included in the FEIS and Record of Decision (ROD). We recommend including prohibitions on OHV events during times when species are rearing young. Other noise mitigation for OHVs should be considered, as appropriate.