



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

September 20, 2010

Robert Edwards
RMP Team Lead
Bureau of Land Management
5100 E. Winnemucca Boulevard
Winnemucca, NV 89445

Subject: Draft Winnemucca District Resource Management Plan and Environmental
Impact Statement, Nevada (CEQ #20100225)

Dear Mr. Edwards:

The U.S. Environmental Protection Agency (EPA) has reviewed the Winnemucca District Office Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS) pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA recognizes the inherent challenges of managing an area for multiple uses. We commend the BLM for developing a broad range of alternatives for sustainably managing the Planning Area and for committing to a preferred alternative that represents, as described in the DRMP/DEIS, "management that is proactive and provides flexibility to adjust to changing conditions over the life of the plan."

However, based on our review of the document, we have rated the DRMP/DEIS as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). We are concerned about the lack of specific measures to protect sensitive resources in the preferred alternative (Alternative D), as well as the number of acres open to off-highway-vehicles (OHV). We also ask that BLM provide additional information regarding how climate change may affect the Planning Area. Our detailed comments are enclosed.

We appreciate the opportunity to review this DRMP/DEIS, and are available to discuss our comments. When the final RMP/EIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at (415) 947-4221 or gerdes.jason@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of Rating Definitions
EPA Detailed Comments

**EPA DETAILED COMMENTS ON THE WINNEMUCCA DISTRICT OFFICE DRAFT
RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT,
NEVADA, SEPTEMBER 20, 2010**

Management Plan for the Preferred Alternative

EPA is pleased that BLM's preferred alternative includes a management strategy that is "proactive and prescriptive," and provides "flexibility to adjust to changing conditions." Incorporating flexibility into the Resource Management Plan (RMP) should enable BLM to adapt to the environmental changes that will inevitably come to the Planning Area over the two decades or so it is in place. While EPA is generally supportive of the provisions in the preferred alternative (Alternative D), we are concerned that many of its protective measures are not firm commitments outlined in the RMP, but rather conditional, based on monitoring, or in the case of some activities, voluntary.

For example, under Alternative C, Option 1, "surface disturbance activities would be required to maintain, protect, or reduce adverse impacts on soil resources, and all land where the surface has been disturbed would be required to be reclaimed," while under Alternative D, "surface-disturbing activities...would be encouraged to maintain, protect, or reduce adverse impacts." Other protective features of Alternative C that EPA would like to see incorporated into the preferred alternative include the protection of eligible river segments identified in BLM's Wild and Scenic Rivers (WSR) report, and closing Wilderness Study Areas (WSA) or areas with wilderness characteristics "to mineral leasing and salable mineral deposit" as well as designating these areas as "right-of-way (ROW) exclusion zones."

Recommendation:

EPA recommends that BLM incorporate more specific measures into the preferred alternative to protect sensitive resources. These measures should include requiring mining and other surface disturbing activities to maintain, protect, or reduce adverse impacts on soil resources; protecting eligible WSR segments; closing WSAs or areas with wilderness characteristics to mineral leasing and salable mineral deposit; and preserving more habitats for sensitive species such as the sage grouse.

Impacts on Air Quality and Species from OHV Activity

EPA is cognizant of the challenge presented to the Winnemucca District Office (WDO) by the popularity of off-highway vehicle (OHV) use in the Planning Area. EPA is concerned, however, about the impacts to air quality and sensitive species from OHV activity in the WDO area. Although each of the action alternatives restricts open OHV use, only Alternative C completely precludes it. Alternative D severely restricts open OHV use, but would still allow it on 289,932 acres (four percent of BLM-administered lands). Given that OHV activity is identified in the EIS as one of the "major sources of air pollution emissions within the WDO area," it is unclear how BLM determined to include a four percent open OHV use provision in its preferred alternative.

Recommendations:

EPA recommends that the BLM explain in the FEIS how it was determined that the preferred alternative would include open OHV use on four percent of BLM-administered lands. We also recommend that BLM provide additional information explaining how, with the travel analysis still being conducted, the Planning Area road network will be determined.

Climate Change

The DEIS provides a reasonable amount of information about the historical sources of greenhouse gas (GHG) emissions in the Planning Area. Information was not provided, however, to compare anticipated emissions between the proposed alternatives. It is also not clear that reducing emissions is an objective of this RMP, or even that the preferred alternative would achieve reductions. This is a concern because both Executive Order 13514 and Secretarial Order No. 3289, among other directives, have charged BLM with accounting for, and reducing, emissions resulting from Federal land management practices, and considering and analyzing potential climate change impacts when developing multi-year management plans. Considering that the RMP, once implemented, will guide resource management decisions in the Planning Area for years to come, BLM should choose an alternative that minimizes and mitigates GHG emissions to the greatest reasonable extent.

Additionally, the DEIS states that climate change will “alter temperature, precipitation, and snowpack conditions, resulting in changes to vegetation, streamflow, and the flow of springs.” There are no detailed descriptions, however, of how potential climate change effects, including the expected warming of the Planning Area and decrease in winter snowpack, may affect sensitive species.

Recommendations:

EPA recommends that BLM provide additional information comparing anticipated GHG emissions for each of the proposed alternatives, and select an alternative that fulfills BLM and Administration directives by reducing GHG emissions in the Planning Area. Also, EPA asks that BLM describe how climate change may affect specific Planning Area sensitive species. We also recommend that BLM include a comprehensive strategy in the RMP for dealing with potential climate change impacts and adapting the RMP accordingly.