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

July 27, 2006

Planning Coordinator
Bureau of Land Management
Eagle Lake Field Office
2950 Riverside Drive
Susanville, CA 96130

Subject: Draft Environmental Impact Statement (DEIS) and Resource Management Plan, Alturas Field Office, Lassen, Modoc, Shasta, and Siskiyou Counties, California (CEQ # 20060150)

Dear Planning Coordinator:

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 provides guidance for the management of public lands administered by the Alturas Field Office for the next 20 years. 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 water quality/riparian impacts from livestock, especially in the watershed of the Pit River, an impaired water body under Clean Water Act Section 303(d), soil and vegetation, and rangelands. We request additional information regarding monitoring for compliance with the Northeast California Resource Advisory Council Recommended OHV Management Guidelines.

With regard to rangelands, we recommend BLM consider the sustainability of range resources in planning for the Alturas Field Office, where 91% of land is in grazing allotments. We understand local government officials suggest that economic considerations be high priorities in the making of resource management decisions. However, BLM must have a longer-term vision towards the sustainability of resources upon which ranchers and local communities depend. Environmental resource conditions that are expensive or impossible to reverse should be actively prevented. Examples are soil disturbances that lead to long-term negative changes in soil ecology and productivity, and plant communities at-risk for permanent conversion to exotic species. We suggest that long-term economic impacts to ranchers and local communities from the permanent loss of rangelands be considered in this long-term planning document.

Consistent with these concerns, we have recommendations for changes to the preferred alternative to provide greater protection to rangelands and associated soils and vegetation, and to

riparian areas from livestock. We recommend additional acreage be designated in Areas of Critical Environmental Concern (ACECs), and that some additional road closures be considered in support of resource protection.

EPA appreciates the opportunity to review this DEIS and commends BLM for a thorough document with an effective organizational format. 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

Rangeland Health

The Draft Environmental Impact Statement (DEIS) states that over a quarter of all rangelands (119,618 acres) in the Alturas Field Office (AFO) are designated as Category 1, where rangeland health standards are not being met and livestock are the cause (p. 3-41). Despite this, the preferred alternative makes no changes in the active or authorized animal unit months (AUM) over current conditions (no action), while reducing acreage open to grazing by 2800 acres (p. 2-208).

The preferred alternative proposes to protect range resources through adjustments to grazing systems and allotment management plans for Category 1 allotments. These actions require more labor and management in planning and range improvements than at present (p. 4-93). We are concerned with this approach because many Bureau of Land Management (BLM) program areas have received insufficient funding to meet existing demands and future funding levels are uncertain but not likely to show substantial increases (p. 4-3). While the DEIS assumes existing personnel and resources will be redistributed to respond to new priorities, the amount of work accomplished annually to meet plan direction would continue to depend on annual budgets and overall BLM priorities. This economic environment could decrease the effectiveness of the preferred alternative's strategy to protect range resources; therefore, it is appropriate to also include other modes of protection for this resource, such as reducing the AUM.

The DEIS notes that components of the preferred alternative were selected to not only foster healthy vegetation but to provide for human commodity needs. Human commodity needs are important but must be weighed against the risk of vegetation type conversion. The DEIS states that if plant communities are allowed to cross a certain ecological threshold, they can achieve a degenerate and unproductive state that is very expensive, if not impossible, to reverse (p. 4-237). If degraded plant communities fall below the threshold for possible restoration, this would result in more substantial long-term economic impacts to ranchers. Within the last 25 years, noxious weeds have noticeably increased in areas of heavy livestock use, among other areas. While at least 10,154 acres of upland degraded soils would be restored under all alternatives (p. 4-83), we are concerned that not enough impaired rangelands are being improved for long-term protection of range resources.

> *Recommendation*
> BLM should consider some reduction in actual AUM in the AFO, focusing on Category 1 allotments and other allotments where land health standards are not being met due to unknown or other causes.
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> The DEIS states that when a permit is voluntarily retired, BLM will consider utilizing the allotment as a forage reserve (p. 2-208). We recommend that BLM ensure all retired allotments are used as forage reserves, focusing on relieving grazing pressure in Category 1 rangelands until rangeland health improves in these areas.

Livestock Impacts on Water Quality/Riparian Resources

As the DEIS notes, the main stem of the Pit River from Alturas to Shasta Lake is listed on the Clean Water Act Section 303(d) list as an impaired water body for nutrients, dissolved oxygen, and temperature. Agriculture-grazing is the potential source listed on the 303(d) list. The Bureau of Land Management (BLM) manages a significant amount of land adjacent to tributaries to the Pit River (p. 3-96) and the DEIS notes that livestock impacts on stream banks and riparian vegetation play a significant role in lowering water quality and elevating temperatures. It is generally agreed that the combined effects of these two factors have been most significant in the failure to meet water quality standards and proper hydrologic function (p. 2-164).

In the AFO, 15 miles of streams, 28 acres of springs and 46 acres of wetlands are known to not be in Properly Functioning Condition (PFC). It is likely that additional areas which have not yet been assessed would fail to meet land health standards (2-166). Thirty miles of streams are known to be in need of treatments for hydrologic function or water quality standards (p. 2-167). We commend BLM for proposing livestock (and other access) exclosures for all spring areas not in PFC (p. 4-301). Because the Pit River is in violation of livestock-related water quality standards, it is appropriate to extend this protection to all riparian areas not in PFC in the greater Pit River watershed.

Recommendation

We recommend that livestock grazing be prohibited and exclosures constructed in riparian areas designated as "functioning at risk" (FAR) until these areas are reassessed as being in PRC. While the DEIS states that livestock exclusion fencing would be constructed in areas that are FAR (p. 2-141), the table on page 2-223 does not indicate that the preferred alternative will fence these areas.

The DEIS states that riparian uses and activities in general would continue as long as there is unimpeded progress towards attaining PFC (p. 2-229). It is not clear how this would be determined and/or measured. Our recommendation of closing riparian areas FAR to livestock grazing is consistent with attaining progress towards PFC and we request it be included and clearly articulated in the preferred alternative. If this change is not made, include more information on how "unimpeded progress" towards PFC will be determined.

In the FEIS, include a map that more clearly delineates watersheds and includes the named waterways and reservoirs cited in the document.

Areas of Critical Environmental Concern (ACEC)

The preferred alternative designates 29,171 acres as ACECs, as compared to 40,079 acres and 83,007 acres under Alternatives 1 and 2 respectively. The DEIS states that the larger ACEC designation of Alternative 2 would better protect water resources and would result in major short-and long-term benefits to watershed health (p. 4-297). Benefits to recreation are also greater where special management designations occur since closures and restrictions preserve natural and cultural resources and unaltered natural settings in these areas (p. 4-115).

Recommendation
EPA recommends the greater use of ACECs in the AFO for the protection of resources. We recommend acreage protected for the preferred alternative be closer to that of Alternative 2, with road closures in all ACECs to protect soils, vegetation, and riparian areas from sedimentation. Specifically, we recommend including in the preferred alternative:

- Pit River Canyon ACEC (6,703 acres) with 16 miles of river designated as Wild and Scenic for the benefit of riparian and river ecosystems, wildlife, and visual resources. This would have a negligible effect on OHV use since it is physically inaccessible to motorized vehicles, and would benefit vegetation and have only negligible effects on grazing (4-148).
- Lava ACEC (10,770 acres) to protect 20 acres of sensitive plants associated with vernal pools (4-145)
- Juniper Creek ACEC (1,182 acres) and Beaver Creek ACEC (972 acres) to protect riparian plant and animal communities, unique cultural resources, special-status plants and wintering wildlife habitat (p. 4-151).
- More acreage for the Likely Tablelands/Yankee Jim/Fitzhugh Creek ACEC to protect sensitive plants, cultural resources, and wildlife habitat, especially in areas around Fitzhugh Creek for the protection of riparian resources and cold-water fisheries (p. 2-65).

Impacts from Roads/OHV Use

We commend the BLM for the substantial reductions in cross-country travel by Off-Highway Vehicles (OHV) in the AFO. OHV use compacts soils and increases erosion. Repeated activities can strip land of native plants, cause gullying and off-site sedimentation, and introduce and spread noxious weeds (p. 4-130). Changes in vegetation effect other resources; especially

soils, water quality and quantity, health and abundance of wildlife, preservation of cultural resources, and the quality of recreational experiences (p. 4-215).

The preferred alternative closes less than 1% of the management areas to OHV travel. It closes 7 miles of dirt roads, and leaves 897 miles accessible via existing or designated roads and trails. In addition, the preferred alternative proposes a total of three special OHV management areas: Cinder Cone, Barnes Grade, and the Fall River Trail (p. 4-116).

EPA has concerns regarding the impacts to resources from OHV and motor vehicle use. In total, the preferred alternative would build 20 additional miles of permanent roads and 350 miles of temporary roads (p. 4-301). Energy proposals could build as many as 130 miles of permanent roads (4-49). Without a comparable closure of existing roads, soil, vegetation, and riparian resources will suffer. In addition, Appendix C includes the Northeast California Resource Advisory Council Recommended OHV Management Guidelines, but the DEIS does not include a monitoring timeline to ensure that these guidelines are met.

Recommendation

EPA recommends additional road closures to protect resources. Areas where OHV traffic is responsible for significant increases in infestation by annual grasses and noxious weeds should be closed, including the mixed ceanothus chaparral communities of the Fall River watershed and the big sagebrush/desert peach associations near Alturas, California (p. 2-137).

As mentioned above, we recommend additional ACEC designations and the closure of roads in these areas. We also recommend the 600 acres of public land on the Williams Ranch be closed to OHV travel to protect riparian areas and fish habitat (p. 2-109), especially since this area appears to be in a stream area designated as FAR (Map: Water-1). We are also concerned with the implementation of the OHV restrictions in the Day Bench area. It is not clear how alternating between designated and existing roads and trails in different times of the year will affect resources and patterns of use, and it might encourage the creation of new roads and trails. We recommend this area's use be classified as designated roads and trails to avoid confusion and protect watershed resources.

The FEIS should discuss how compliance with the Northeast California Resource Advisory Council Recommended OHV Management Guidelines will be determined and details of associated monitoring. Specifically, address how compliance with Guideline 2 (ecological degradation from OHV use) and Guideline 14 (monitoring for utilization and impacts) will be ensured.