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

July 27, 2006

Dayne Barron, Field Manager
Eagle Lake Field Office
Bureau of Land Management
2950 Riverside Drive
Susanville, CA 96130

Subject: Eagle Lake Field Office Draft Resource Management Plan and Environmental Impact Statement (EIS), Lassen, Plumas and Sierra counties, California, and Washoe County, Nevada [CEQ #20060151]

Dear Mr. Barron:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

The Draft EIS assesses alternatives for management of 1,022,767 acres of Federal land by the Bureau of Land Management's (BLM) Eagle Lake Field Office. The Draft EIS is well organized and provides much useful information regarding the resources in the field office area. In addition, it appears that the Preferred Alternative will improve resource conditions there. We have some concerns, however, regarding impacts to water quality and riparian habitat from grazing and off-highway vehicle activities. We recommend revising the Preferred Alternative to address these concerns and addressing them in the Final EIS. We have, therefore, rated this Draft EIS as EC-2 – Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions"). Our detailed comments are enclosed.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 972-3988, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/s/

Duane James, Manager
Environmental Review Office

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Enclosures: Summary of Rating Definitions
EPA's Detailed Comments

Eagle Lake Resource Management Plan Draft EIS
EPA Comments – July, 2006

Watershed Impacts – Riparian/Wetland Areas, Soil Resources, Water Quality

Grazing and off-highway vehicle (OHV) use can significantly affect the functioning condition of wetland and riparian areas over the long term by increasing erosion, compaction, sedimentation, and runoff rates. These impacts lead to changes in channel geomorphology and water quality, including increases in temperature, nutrients, fecal coliform, total suspended solids, turbidity, and other contaminants.

According to the Draft EIS (p. 2-152), BLM's objective is to have all riparian areas making progress toward properly functioning condition (PFC) and meeting Land Health Standards throughout the field office area. Therefore, the Preferred Alternative emphasizes adjusting grazing strategies where grazing is limiting progress toward land health goals and riparian and wetland areas are functioning at risk with static or upward trends. EPA supports BLM's management activities that result in progressing toward PFC and encourages BLM to consider setting higher goals, such as those under the Ecosystem Restoration Alternative, for PFC and functioning at risk with static or upward trends.

> **Recommendation:** In addition to managing riparian and wetland areas functioning at risk in an upward trend, BLM should vigorously manage grazing in riparian and wetland areas that are functioning at risk in a static or downward trend in order to facilitate their recovery.

Under the Preferred Alternative, BLM would also investigate enlarging protected riparian areas. It is unclear whether the Preferred Alternative would require 100-foot buffer zones or 50-foot buffer zones in surface waters that do not meet PFC or water quality standards. Temperature is an important aspect of stream PFC, and improving streams to meet their pre-disturbance natural shade and associated vegetation characteristics is critical. In California, the water quality standard that applies to temperature is:

> "The natural receiving water temperature of intrastate waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses."

> **Recommendation:** We recommend grazing buffer zones of at least 100 feet along water bodies that do not meet PFC or water quality standards in order to reduce stresses that could impede improvements of these conditions.

The Preferred Alternative would restrict OHV use to designated routes in most of the field office area and completely close some areas to OHV use. This should help improve soil conditions, habitat, and water quality in the area. However, some routes that would remain open to OHV use under the Preferred Alternative appear to be adjacent to streams

that either are at risk of not meeting water quality standards, do not meet standards, or are impaired (Maps Travel-6 and Water-1).

> **Recommendation:** EPA recommends that BLM include in the Preferred Alternative closure of all OHV route segments adjacent to these waters to improve soil conditions, habitat, and water quality.

Rangeland Health

The Draft EIS (p. 3-44) defines rangeland health assessment (RHA) categories 1 through 4, by which grazing allotments are rated. However, the document does not provide the ratings for each allotment. In addition, Appendix M provides the stream survey summaries for the field office area. It is unclear how the RHA category ratings, stream surveys, or monitoring data will be used to develop new grazing allotment management plans for individual allotments as they are renewed over the life of this RMP.

> **Recommendation:** The Final EIS should include the RHA ratings for existing allotments in the field office area, and indicate the goals for improving RHA ratings under each alternative. The Final EIS should also discuss how stream survey, monitoring, and rangeland health data will be used to determine specific management activities for individual allotments as they are renewed over the life of this RMP.