



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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May 23, 2007

Mark Lambert
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Bureau of Land Management
Tucson Field Office
12661 East Broadway Boulevard
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Subject: Ironwood Forest National Monument Draft Resource Management Plan and
Environmental Impact Statement, Arizona [CEQ #20070068]

Dear Mr. Lambert:

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 (CEQ) Regulations (40 CFR Parts 1500-1508), and our NEPA review authority Section 309 of the Clean Air Act (CAA).

The Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS) assesses alternatives for the management of 189,600 acres of land in the Ironwood Forest National Monument (IFNM). Approximately 128,400 acres are administered by the Bureau of Land Management's (BLM) Tucson Field Office; approximately 54,700 acres of State Trust land are administered by the Arizona State Land Department; and approximately 6,000 acres are privately owned. The DRMP/EIS is well organized and provides much useful information regarding the resources in the IFNM. We commend the BLM for a well-written programmatic document.

Based on our review, we have rated the DRMP/EIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "Summary of Ratings"). We have concerns regarding environmental impacts from off-highway vehicles (OHV), particularly in non-attainment areas, livestock grazing, and mining. Overall, EPA recommends selecting Alternative B as the preferred alternative, as this alternative is the most environmentally protective. To address air quality impacts in all of the alternatives considered, EPA recommends restricting OHV use in non-attainment areas and implementing mitigation measures to reduce the impacts of OHV use to air quality. EPA's recommendations are further discussed in our Detailed Comments (attached).

We appreciate the opportunity to review this DRMP/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) 972-3846, or have your staff contact Ann McPherson at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,

/s/

Nova Blazej, Manager
Environmental Review Office

Enclosures: Summary of Rating Definitions
EPA Detailed Comments

Off Highway Vehicles – Environmental Impacts and Protections

The Draft Resource Management Plan/Environmental Impact Statement (DRMP/EIS) documents the potential environmental impacts from motorized vehicles and off-highway vehicles (OHVs) in the Ironwood Forest National Monument (IFNM) including: 1) impacts to air quality (pgs. 4-4 to 4-8); 2) impacts to soils and water resources (pg. 4-16 to 4-19); 3) impacts to vegetation, including removal of native plants and dispersal of noxious weeds or invasive plant species (pg. 4-21); 4) impacts on wildlife and wildlife habitat, including mortality of wildlife and alterations in behavior or reproduction through stress and disturbance (pg. 4-32; pg. 4-41); 5) impacts to cultural resources (pg. 4-59); and 6) impacts on livestock grazing, including harassment and loss of forage (pg. 4-87).

The DRMP/EIS states that on-road vehicles represent the largest single air-pollutant source category within the planning area. Vehicles traveling on unpaved roads are the largest sources emissions of particulate matter with a diameter of 10 microns or less (PM₁₀) within the planning area (pg. 3-7). OHV travel can result in an increase in concentrations of PM₁₀ emissions not only when vehicles are in use, but also after the cessation of activity, due to the physical disturbance of soils and resulting erosion. Cross-country OHV use in open OHV areas has the potential to cause the greatest amount of harm to soil, vegetation, and wildlife.

Air Quality Impacts

The Bureau of Land Management (BLM) requires that road and trail access and OHV management guidance are incorporated into every RMP, and that each RMP will divide planning areas into OHV area designations (open, limited, or closed). The Preferred Alternative C would close 10,880 acres of BLM land to vehicular traffic, and motor vehicle use would be allowed on designated routes on the remaining 117,520 acres (pg. 4-6). Alternative B would place more restrictions on motorized travel throughout the IFNM and would close 37,060 acres to vehicular traffic and limit motor vehicle use to designated routes on 90,360 acres. Both alternatives would permit OHV use on designated routes (maps 2-20, 2-21) that are located within PM₁₀ non-attainment areas (map 3-1).

Recommendation:

EPA recommends that BLM select Alternative B as the preferred alternative, which closes 37,060 acres to vehicular traffic and limits motor vehicle use on 90,360 acres. Under Alternative B, only 71 miles of routes would be available for motorized vehicle travel, as compared to the Preferred Alternative C, where 142 miles would be designated for motorized vehicle travel and 10,880 acres would be closed to vehicular traffic.

Recommendation:

EPA recommends that BLM limit the expansion of OHV use in PM₁₀ non-attainment areas. Under Alternative B, the PM₁₀ non-attainment area overlaps 23,650 acres where motorized vehicle use would be allowed on designated routes (pg. 4-5). Under the Preferred Alternative C, the PM₁₀ non-attainment area overlaps 29,930 acres where motorized vehicle use would be allowed on designated routes (pg. 4-6). EPA recommends that BLM consider additional restrictions on OHV use within the PM₁₀ nonattainment area.

Recommendation:

EPA recommends that the BLM fully evaluate current OHV usage in regulated and non-regulated areas; estimate PM₁₀ emissions from OHV use; and address permitting and enforcement efforts. BLM can evaluate the consequences of OHV management decisions only if baseline conditions have been established initially, and it is unclear whether this has been done. This information should be included in the Final Environmental Impact Statement (FEIS).

Recommendation:

EPA recommends that BLM adopt general mitigation measures to reduce OHV impacts on air quality, especially in areas of non-attainment: 1) motorized competitive races should not occur in PM₁₀ non-attainment areas; 2) BLM should prohibit all OHV use in the PM₁₀ non-attainment areas on high pollution days as forecasted by the Arizona Department of Environmental Quality; 3) use gates, fences, and other barriers to minimize emissions/fugitive dust, as well as erosion; and 4) require permits to manage OHV use.

Closures of OHV Management Areas

Within Closed OHV Management Areas, no motorized travel would be allowed. Closed OHV Management Areas have beneficial impacts to air quality, soil resources, vegetation, wildlife, and cultural resources. Closing OHV Management Areas reduces fugitive dust emissions in the planning area and benefits soil resources and vegetation by reducing compaction, preventing erosion, and reducing the dispersion of non-native plants. Closed OHV Management Areas presented in the Preferred Alternative C include: 9,900 acres to protect wildlife habitat; 340 acres to protect cultural resources at Cocoraque Butte; and 640 acres to protect other cultural resources. Alternative B recommends closures of 37,060 acres to protect wilderness characteristics, as well as 980 acres (as described in Preferred Alternative C) to protect cultural resources.

Recommendation:

EPA recommends that BLM close the OHV Management Areas described in Alternative B, which would provide protection for 38,040 acres of sensitive lands, soil resources, vegetation, and cultural resources. Closing areas with extensive heritage resources would reduce direct and indirect impacts on cultural resources.

Selecting Alternative B would also result in the least impacts to wildlife and wildlife habitat (pg. 4-36).

OHV Access Management Process

The Route Inventory is a key component of the IFNM Travel Management Plan. An inventory of existing travel routes within the IFNM was completed in 2003, and the evaluation process is described in Appendix G of the DRMP/EIS. The existing road network consists of 346 miles of existing routes and 39 existing access points (pg. 3-50). Maps depicting route numbers were not included in the DRMP/EIS; however, they can be reviewed on-line (pg. G-13).

Recommendation:

The locations of inventoried routes need to be clearly illustrated on maps and referenced appropriately in the FEIS. The 18 route inventory maps that contain this information should be included in the FEIS and should be referenced in the table of contents and within the text of the FEIS (table 2-16; maps 2-19, 20, 21, and 22; sections 3.1.1 and 4.3.1; and Appendix G).

Livestock Grazing Impacts

Grazing can significantly affect the functioning condition of riparian areas by increasing erosion, compaction, sedimentation, and runoff rates. Arid regions of the Southwest are particularly fragile and susceptible to damage from livestock grazing. Livestock can have a dramatic impact on riparian areas in fragile arid lands by trampling down stream banks, snapping tree seedlings, and denuding the vegetation. Currently, the entire IFNM is available for grazing, and grazing leases are held for 11 allotments (pg. S-7). Under Alternative B, livestock grazing would not be permitted after leases expired, in order to maximize preservation of IFNM resources. The retirement of grazing leases could improve soil and watershed conditions by allowing the vegetation of areas denuded of grasses, which would help prevent erosion and wind-blown dust in those areas (pg. 4-6).

Recommendation:

EPA recommends that BLM select Alternative B and not plan to renew the leases for livestock grazing within the IFNM in order to maximize preservation of IFNM resources. EPA also recommends that, for which ever alternative is selected, a monitoring and adaptive management plan is implemented to minimize the impacts of grazing (discussed below).

Mining Impacts

The DRMP/EIS states that there are 33 active or abandoned mine sites and 225 existing mining claims in the IFNM (pg. 3-71). There are no active metallic mineral mines in the decision area, and there are no active nonmetallic mineral mines in the planning area (pg. 3-43). The only active metallic mineral mine is the Silver Bell Mine,

which is located immediately adjacent to the planning area boundary (pg. 3-63). The DRMP/EIS states that no mining occurs within the IFNM (pg. 3-43); however, it also states that the Silver Bell Mine is currently operating (pg. 3-63). According to Map 3-8, the Silver Bell Mine is located within the IFNM.

Mining activities at valid existing claims (approximately 4,590 acres) could cause localized surface disturbance and remove existing vegetation sources. Mine tailings located at both active and closed mine sites are potentially hazardous because chemicals in the tailing piles can potentially leach into soils and/or groundwater or become airborne hazardous wastes.

Recommendation:

EPA recommends that the FEIS provide clarification on the location of the Silver Bell Mine and the other 33 active or abandoned mine sites in the IFNM. The FEIS should also categorize which sites contain tailing piles or open pits which may be potentially hazardous. As appropriate, the FEIS should also identify steps BLM will take to ensure public safety with regard to mine hazards.

Areas of Critical Environmental Concern

Federal agencies are directed to protect and conserve ecosystems in need of “special management attention” by designating them as “areas of critical environmental concern” (ACEC) in their land use planning process (pg. 2-13). These areas must have substantial significance and value and require special management actions. The Waterman Mountains ACEC (2,240 acres) was established in 1989 by the Phoenix RMP in order to protect the Nichol’s Turk head cactus. Alternatives B, C, and D recommend removal of the ACEC designation and reclassification of the Waterman Mountains as a Vegetation Habitat Management Area (VHA), rather than an ACEC.

Recommendation:

EPA recommends that the FEIS describe the difference between the ACEC and VHA designations and why the VHA has been identified as a more appropriate management vehicle for the Waterman Mountains. EPA also recommends that BLM provide funding for the implementation of the VHA at Waterman Mountains and identify the source of this funding in the FEIS.

Biological Monitoring and Adaptive Management Plan

Surface disturbance and disruptive activities, such as OHV use and grazing, can cause loss of habitat, habitat fragmentation, and wildlife displacement. In order to evaluate the impacts on threatened and endangered species, baseline conditions must be determined initially.

Recommendation:

EPA recommends that BLM establish a monitoring and adaptive management plan for threatened and endangered species. Baseline conditions should be

determined initially, and a monitoring and adaptive management plan should be established to evaluate and respond to the impacts on resources in the IFNM. A description of the monitoring and adaptive management plan, and funding necessary to implement this plan, should be included in the FEIS.