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

July 27, 2006

Owen Billingsley
Field Manager
Bureau of Land Management
Eagle Lake Field Office
2950 Riverside Drive
Susanville, California 96130

Subject: Draft Environmental Impact Statement (DEIS) for Surprise Field Office Resource Management Plan (CEQ# 60152)

Dear Mr. Billingsley:

The U.S. Environmental Protection Agency (EPA) has reviewed the DEIS referenced above. Our review is 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.

This Resource Management Plan (RMP) and related DEIS provide direction for managing the public lands in the Surprise Field Office planning area (approximately 1,220,644 acres). This RMP was developed in coordination with the Alturas and Eagle Lake Field Office RMPs as they will provide the framework for land management in northeast California and northwest Nevada. The DEIS notes that population growth near the project area has increased the demand for use of public lands to support community needs and provide recreation opportunities.

The DEIS evaluates four action alternatives that propose different management strategies for natural resource uses (including recreation, grazing, and energy and mineral resources). The Preferred Alternative in the DEIS is a result of the combination of management actions from the other three alternatives analyzed. While we recognize the need to balance the multiple resource uses in the area, we have concerns with the impacts to vegetation, soils, and riparian areas as a result of the Preferred Alternative and have rated this document as Environmental Concerns, Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions").

In particular, we note that the Preferred Alternative will have impacts to vegetation and water resources due to competition for necessary resources, degradation of wildlife habitats, and increased levels of harassment, with many of the additional impacts stemming from Off-Highway Vehicle (OHV) use (p. 4-245). Given these foreseeable impacts, we recommend that the Preferred Alternative be adjusted to incorporate a few of the minimization measures from Alternative 2, the Ecosystem Restoration or Protection Alternative.

We also request that additional information be included in the FEIS regarding the ability to meet the Rangeland Health Standards and Guidelines in Appendix B, monitoring and mitigation timelines for vegetation impacts, and mitigation measures to reduce impacts to water quality and air quality as a result of the project.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send (3) copies to the address above (mailcode: CED-2). If you have any questions, please contact me at 415-972-3988 or Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847.

Sincerely,

/S/
Duane James, Manager
Environmental Review Office

Main ID # 4822

Enclosures: Summary of Rating Definitions
Detailed Comments

Vegetation Impacts

The document notes that livestock grazing has widespread cumulative impacts to vegetation (p. 4-146). In particular, impacts to vegetation from the preferred alternative will result from mineral development, OHV use, and livestock trampling (p. 4-139, 144-6). In addition, OHV use is projected to increase dramatically during the life of the plan. The mitigation measures included in Alternative 2 would offer additional protection to vegetation. For example, Alternative 2 would restore native rangelands through resting each allotment every two to three years, with 40,685 Animal Unit Months (AUMs) active annually and reestablishes special status species through restoration of suitable degraded habitat. We note that overgrazing and a reduction in vegetation would also result in secondary impacts to cultural resources in the area (p. 3-21).

Rangeland health conditions are reported annually to monitor for impacts resulting from rangeland management (Appendix B, p. A-22). However, it is unclear how the applied AUMs would respond to these changing conditions. 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.

Recommendations:

The FEIS should consider including portions of the minimization measures included in Alternative 2, such as a reduction in AUMs or a reestablishment of special status species.

The FEIS should ensure that future AUMs are based on the annually-reported rangeland health conditions. It should also ensure that the Guidelines in Appendix C are considered in monitoring efforts for project impacts. In particular, the FEIS should discuss monitoring to comply with Guideline 2 (ecological degradation from OHV use) and Guideline 14 (monitoring for utilization and impacts).

Soils Impacts

The primary indicators for evaluating the condition of soil resources are soil stability and hydrologic function, which are part of BLM's Land Health Assessment (LHA) (p. 4-102). The indicators for the LHA are influenced in part by soil compaction and erosion from ground disturbances, livestock distribution, and roads. Minimization measures in Alternative 2 limit or exclude activities that would cause further damage to soils (p. 2-129) and this alternative would have beneficial effects to soils as a result of 100 foot buffers in riparian areas. Additionally, Alternative 2's exclusion of OHV travel from Massacre Beach and Bitner Ranch would also help minimize impacts to soil resources. Massacre Beach and Bitner Ranch have been nominated as Areas of Critical Environmental Concern (ACEC). These are areas for which special management attention is required to protect and prevent irreparable damage to resources (p.3-60).

Recommendations:
BLM should consider including buffer zones in riparian areas and restricting OHV travel in the proposed ACECs to reduce soil erosion from livestock use.

FEIS should discuss monitoring to comply with Guideline 9 in Appendix C (soil erodibility from OHV use).

Rangeland Impacts

The Draft Environmental Impact Statement (DEIS) states that 23% of all rangelands (333,332 acres) in the Surprise Field Office planning area are designated as Category 1, areas in which rangeland health standards are not being met and livestock grazing is a significant contributor to the problem. Duck Lake, Home Camp, Bull Creek, Wall Canyon East, Board Corral allotments are not meeting rangeland health standards and recent livestock grazing is a primary cause. However, the preferred alternative makes no changes in the active or authorized 92,465 animal unit months (AUM) over current conditions (p. 2-44). It also notes that an increase to 97,088 AUMs could occur based on forage availability and improved livestock distribution (p. 4-75) but there is no information regarding the monitoring strategy on which this would be based.

Appendix B includes the Standards for Rangeland Health and Guidelines for Livestock Grazing Management. However, it is unclear how BLM will implement and meet these guidelines. In particular, Guideline 3 calls for periods of rest from grazing during/after periods of stress on the land (p. A-17), but there is no indication of the monitoring schedule to identify these impacts.

Recommendations:
BLM should consider some reduction in actual AUMs in the Surprise Field Office planning area, with a focus on Category 1 allotments.

The FEIS should discuss monitoring to comply with Guideline 3 in Appendix C.

Water Quality Impacts

Grazing and 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. Table 3.17-1 shows the water quality conditions to key streams in the Surprise Field Office planning area and many of the streams are not meeting state standards, beneficial use needs, or water quality criteria in the standards and guidelines. However, there is no water map included that allows an overlay of the proximity of OHV routes, areas of soil degradation, or roads to degraded watersheds. It is unclear from the document how monitoring and future grazing and OHV management will assist in moving these streams towards better functioning condition. In particular, we note that the Preferred Alternative does not include the construction of fences or exclosures to protect streams, springs, and riparian areas as proposed in Alternative 2 (p. 2-141).

Recommendations:
The FEIS should include a map showing the watersheds and the related water quality conditions of the key streams. It should describe how streams not meeting water quality standards will be incorporated into plans for exclosures and other mitigation methods under the Preferred Alternative.

FEIS should discuss monitoring to comply with Guideline 12 in Appendix C (protection of water quality).

Air Impacts

For air impacts, the document notes that "suitable management practices would be applied in compliance with NEPA"(p. 4-6). However, other than the concentration of prescribed burning in spring and fall, additional management practices to reduce air impacts from project activities, such as mineral leasing and OHV use, are not outlined here. This is increasingly important as up to 30 exploration projects are expected within the next 15 to 20 years.

Recommendations:
The FEIS should include additional information regarding the measures that will be used to reduced air impacts from project activities such as mechanical treatments, mineral activities, and OHV use.