UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

March 25, 2013

Cindy Ott-Jones, Superintendent
Lake Meredith National Recreation Area,
Alibates Flint Quarries National Monument
P.O. Box 1460
Fritch, Texas 79036

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS)/Off-Road Vehicle (ORV) Management Plan prepared by the National Park Service (NPS). The purpose of the proposed action is to manage ORV use in the national recreation area for visitor enjoyment and recreation opportunities; while minimizing and correcting damage to resources.

EPA rates the DEIS as "EC-2" i.e., EPA has "environmental concerns and requests additional information" in the Final EIS. The EPA's Rating System Criteria can be found here: http://www.epa.gov/oecaerth/nepa/comments/ratings.html. The "EC" rating is based on the potential for adverse impacts to threatened and endangered species, and minority or low-income populations. The "2" indicates the DEIS does not contain sufficient information to fully assess the impact of the action alternatives, tribal impacts, environmental justice concerns, and impacts to threatened and endangered species. Detailed comments are enclosed with this letter which clearly identifies our concerns and the informational needs requested for incorporation into the Final EIS (FEIS). Responses to comments should be placed in a dedicated section of the FEIS and should include the specific location where the revision, if any, was made. If no revision was made, a clear explanation should be included.

EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS, and an internet link, when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004. Our classification will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, I can be reached at 214-665-8006, or contact Keith Hayden of my staff at hayden.keith@epa.gov or 214-665-2133.

Sincerely,

Debra A. Griffin
Associate Director, Compliance Assurance
and Enforcement Division

Enclosure

DETAILED COMMENTS ON THE
NATIONAL PARK SERVICE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
LAKE MEREDITH NATIONAL RECREATION AREA, TEXAS

BACKGROUND: Lake Meredith was originally created by the construction of Sanford Dam on the Canadian River in 1965, and referred to as the Canadian River Project. The Dam and Lake were designed to provide water for cities in the Texas panhandle. In 1968, the Bureau of Reclamation turned over operation and maintenance of the Sanford Dam and facilities to the Canadian River Municipal Water Authority (CRMWA). The area was established as the Lake Meredith National Recreation Area under the jurisdiction of the National Park Service (NPS) in 1990 with the intent to provide diverse and affordable outdoor recreation opportunities. Today, the Lake Meredith National Recreation Area occupies portions of Moore, Hutchinson, Potter, and Carson counties. The recreation area is over 44,900 acres and the lake is the largest body of freshwater in the Texas panhandle. From 1971 through 2008 the recreation area averaged 1.5 million visitors annually. Two off-road vehicle (ORV) areas were established in the 1970's at the north and south ends of the recreation area. The type of vehicles used and the intensity of use have changed drastically since the ORV areas were established. This has negatively affected soil and vegetation resources, destroyed cultural resources, and led to a rise in visitor use conflicts.

The ORV Management Plan/EIS will assess potential environmental impacts associated with a range of alternatives for managing ORV impacts on park resources such as soils, wetlands, wildlife, cultural resources, visitor experience, and public safety. This effort will result in an ORV Management Plan/EIS that will be used to guide the management and control of ORV's at the Recreation Area for approximately the next 15 to 20 years.

EXECUTIVE SUMMARY

Executive Summary, Page xi

Alternative B includes issuing a no-cost permit for educational purposes, but it is unclear what educational purpose the permit would fulfill. The only education mentioned in the DEIS is through outreach with ORV users via bulletin boards and brochures, and the permits mentioned in the DEIS are for identifying ORV area users. These two measures are common to alternatives B, C, and D.

- Clarify the educational purposes alternative B would serve.

2.0 ALTERNATIVES

Alternative C, Page 52

Implementation of Alternative C would close the area east of Bull Taco Hill to all ORV use. The rationale for this action is never fully explained.

- Describe why closing down the area East of Bull Taco Hill was included in Alternative C. If this action was based on the need to protect natural or cultural resources; then explain why this action was not included in the other action alternatives.

5.0 CONSULTATION AND COORDINATION

Agencies, Organizations, and Individuals Consulted, Page 231

The DEIS does not contain a final determination on the environmental consequences of the alternatives to threatened and endangered species. The U.S. Fish and Wildlife Service (USFWS) was contacted for threatened and endangered species consultation, but there is not a concurrence from the USFWS on any conclusions reached in the DEIS.

- Include concurrence from the USFWS on the NPS determination for impacts of the proposed project to threatened and endangered species.

TRIBAL CONCERNS
Page 232

The DEIS lists ten Tribes that were contacted during the development of the plan, but does not indicate whether they were contacted for government-to-government consultation under E. O. 13175, National Historic Preservation Act (NHPA) consultation, or other reasons. Information, responses, and concerns to/from the listed Tribes were not specified in the DEIS, nor was there any indication of communication with Texas Tribes; including the Kickapoo Traditional Tribe, Ysleta Del Sur Pueblo, Alabama-Coushatta Tribe, and the Tonkawa Tribe. All of these tribes may have an interest in the proposed project location.

- Provide information in the Final EIS to document that all potentially affected Tribes were identified and contacted for both NHPA and E.O. 13175. The Texas State SHPO should also be contacted to provide concurrence on the conclusions reached in the DEIS concerning historic, cultural, or archeological resources. EPA recommends that the NPS continue to communicate and consult with the Tribes as the project progresses.

SOCIOECONOMICS
Page 18

The DEIS did not include any socioeconomic data concerning minority or low-income populations. Also, the NPS did not list Executive Order (E.O.) 12898 in the relevant laws section of the DEIS.

- Discuss the rationale for excluding E.O. 12898 and associated socioeconomic analyses in the Final EIS.

The DEIS analyzes a range of alternatives and actions for the management of off-road vehicle (ORV) use at the Lake Meredith National Recreation Area in the Texas panhandle, northeast of Amarillo. During the scoping process for the plan, topics such as air quality were not further analyzed because the impact level or frequency was not sufficient to warrant a full analysis. Existing air monitoring data in the area does not indicate an air quality problem (e.g., particulate matter) for the area, however, localized air quality impacts from ORV use can affect visitor experience, health and safety.

- EPA recommends that the project alternative selected include mitigation such as separation of visitor uses so that fugitive dust impacts during high wind events are minimized, planned ORV routes, or suspension of ORV use during excessive wind events.