UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 13, 2007

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

Subject: Alturas Field Office Final Environmental Impact Statement (FEIS) and Resource Management Plan, Lassen, Modoc, Shasta, and Siskiyou Counties, California (CEQ # 20070235)

Eagle Lake Field Office Final Environmental Impact Statement (FEIS) and Resource Management Plan, Lassen, Plumas and Sierra Counties, California, and Washoe County, Nevada (CEQ # 20070236)

Surprise Field Office Final Environmental Impact Statement (FEIS) and Resource Management Plan, Modoc and Lassen Counties, California, and Washoe and Humboldt Counties, Nevada (CEQ# 20070237)

Dear Mr. Barron:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced documents. 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. We are providing feedback on each of the three documents listed above.

EPA reviewed the Alturas, Eagle Lake and Surprise Field Office Resource Management Plans and Draft Environmental Impact Statements (DEIS) and provided comments on the DEISs (letters dated on July 27, 2006). We rated each of the Draft Environmental Impact Statements (DEIS) as Environmental Concerns-Insufficient Information (EC-2). For each of the projects we expressed concerns regarding impacts to watersheds, rangeland health, vegetation, air, Areas of Critical Concern (ACEC) and impacts from roads/Off-Highway Vehicles (OHV).

EPA commends BLM for addressing several of the aforementioned environmental impacts in the FEIS. We commend BLM's recommendation to designate approximately 16 miles for Wild and Scenic River designation of the Pit River and the management of grazing in riparian and wetland areas that are functioning at risk as identified in the Alturas Field Office FEIS.

However, we also reiterate a number of mitigation measures recommended by EPA in each of the three Resource Management Plans that should be included in the Record of Decisions (ROD) for the Alturas, Eagle Lake and Surprise Field Office Resource Management Plans to minimize adverse environmental impacts. In our comments, we expressed concern regarding rangeland health. EPA continues to 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. Furthermore, EPA continues to recommend that BLM consider some reduction in actual Animal Unit Months (AUM), especially on Category 1 allotments and other allotments where land health standards are not being met due to unknown or other causes.

EPA remains concerned regarding the environmental impacts of off-highway vehicle (OHV) use on Forest Service lands, within Eagle Lake and Alturas Resource Management Areas. In our comments pertaining to Eagle Lake Field Office, EPA recommended the closure of all OHV route segments adjacent to streams that either are at risk of not meeting water quality standards, do not meet standards, or are impaired (Eagle Lake DEIS, Maps Travel-6 and Water-1). EPA acknowledges BLMs response which consists of modifications to the designated route networks if needed to protect resources and during project-level analysis. However, EPA continues to recommend that BLM include in the ROD the closure of all OHV route segments adjacent to these waters to improve soil conditions, habitat, and water quality.

Ground disturbing activities can lead to the degradation of soils in the short term by increasing erosion, sedimentation, and runoff (Alturas FEIS, p. 4-77). Repeated activities can strip land of native plants, cause gullying and off-site sedimentation, and introduce and spread noxious weeds (Alturas FEIS, p. 4-116). To help deter illegal OHV use that may cause environmental impacts, we encourage the BLM to continue implementing its' enforcement strategies in all Resource Management Areas and encourage the BLM to execute both enforcement and preventive measures more frequently.

We appreciate the opportunity to review these FEISs. When the Record of Decisions (ROD) are signed, please send one copy of each to the address above (mail code: CED-2). If you have any questions, please call me at (415) 972-3846 or Summer Allen, the lead reviewer for this project at (415) 972-3847.

Sincerely,

Summer Allen

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Environmental Review Office