UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

June 11, 2010

Mr. Terry Lee Smith
RMP Project Manager
Bureau of Land Management
Pocatello Field Office
4350 Cliffs Drive
Pocatello, Idaho 83204-2105

Re: Pocatello Proposed Resource Management Plan and Final Environmental Impact Statement EPA Project Number: 01-082-BLM

Dear Mr. Smith:

The U.S. Environmental Protection Agency has reviewed the Pocatello Proposed Resource Management Plan and Final Environmental Impact Statement (RMP/Final EIS). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Thank you for accepting our comments at this time.

We appreciate the BLM responses to EPA comments on the Pocatello RMP/Draft EIS. Our comments on the RMP/Final EIS pertain primarily to those responses, which are located in Appendix U.

Mining

Financial assurance. We note (p. U-66) that BLM intends to include mineral operations performance bonds to reclaim facilities and related surface disturbance from mining operations. EPA has a current and ongoing interest in ensuring that future mining activities not cause or contribute to existing environmental problems in the Pocatello Field Office management area. We would like to affirm the importance of including adequate and complete financial assurance information in all BLM Draft NEPA documents prepared for proposed mining projects.

Recommendation: Include in the Record of Decision (ROD) a commitment to provide adequate and complete financial assurance information in all subsequent draft NEPA documents pertaining to mining proposals that stem from this programmatic RMP.

Reasonably Foreseeable Development Scenarios (FRDS) of Fluid Minerals Direction. The RMP/Final EIS states (p. 4-15) that a geothermal field would be developed on about 42 acres at a site located anywhere within the field office. It is unclear whether designated

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withdrawn and/or restricted areas under the RMP could potentially be used for the geothermal field.

Recommendation: Clarify whether land use restrictions, such as administrative withdrawals, would apply to geothermal field development.

Water Resources

Roads. The RMP/Final EIS states (p. U-73) that BLM feels that it is more appropriate to establish criteria for management action regarding roads and sedimentation, rather than establish [target or threshold] road densities. We support this approach and suggest that road density be included among the criteria evaluated in considering management actions, including road decommissioning. We would appreciate a listing of, or reference to the other criteria that BLM intends to use for this purpose, which we anticipate would include factors such as soil characteristics, slope, stability, historic and current land uses and condition, water quality/condition of aquatic resources and species, and so on. Wildlife disturbance and degree of habitat fragmentation, protection of drinking water sources and aquifer recharge areas, fish, and water quality anti-degradation requirements should also be included when considering road decommissioning.

Recommendation: Include road density among the criteria for evaluating management actions regarding roads and sedimentation, regarding habitat fragmentation and wildlife disturbance, and regarding fish, water quality, anti-degradation requirements, protection of drinking water sources and critical aquifer recharge areas.

Climate Change

We appreciate the inclusion of information in the RMP/Final EIS regarding climate change (p. 3-5, 4-20). The RMP/Final EIS states there is a lack of scientific tools to predict climate change on a regional or local scale. We encourage BLM to visit the University of Washington Climate Impacts Group (CIG) website to explore the information, capabilities, and resources that have become available for predicting regional climate change effects, and potentially incorporating this information into land management plans and programs. The website is found at http://cses.washington.edu/cig/fpt/ccscenarios.shtml.

Recommendation: Remain informed of the current and ongoing development of climate change science information produced by the CIG and other sources available to inform land management actions. Use these products to inform efforts to mitigate greenhouse gas emissions, adapt to climate change effects, and educate public land users.

Sensitive Species, Habitats, and Resources

We commend and thank BLM for the responses to our comments where several management directives are strengthened in the RMP/Final EIS to address sensitive species and habitats. Examples include:

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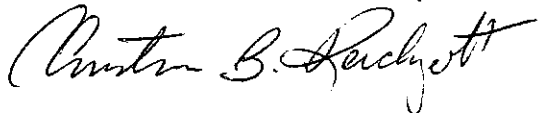
- Administrative withdrawal, pending further NEPA analysis, of the Curlew area (p. 2-78);
- NSO stipulation to protect the Bear Lake Plateau/Sheep Creek Hills area (p. 2-79);
- Revised management direction for sensitive species to provide for flexibility and unforeseen needs as species become known (response 10-A-20, p. U-70);
- Adding new management actions to protect greater sage grouse with respect to wildland fire management (response 10-A-32, p. U-73);
- Limiting snowmobile use in Big Game Winter Range to designated routes (response 10-A-34, p. U-74); and
- Incorporating management actions C-SS-1.2.8 and C-SS-1.2.9 from Alternative C to restore and rehabilitate migratory bird species habitat.

Regarding the response to our comment 10-A-12, where we support No Surface Occupancy (NSO) stipulations or closures in areas and habitats that are environmentally sensitive, the RMP/Final EIS states that BLM follows policy developed in 2006, which directs that "...the RMP direction should use the least restrictive measures to ensure resource protection objectives." This approach to resource management may sometimes fail to adequately protect sensitive resources and ensure that public lands are sustainably managed. Unless there is adequate and ongoing monitoring, which should include triggers or thresholds for management action; it is not possible to know how often this occurs. It would be helpful to disclose the nature and extent of implementation and effectiveness monitoring, any results that illustrate how often and in what circumstances protection shortfalls have occurred, and the environmental consequences.

Recommendation: Provide illustrative examples of resource management decisions using least restrictive measures and their environmental results. Discuss the nature and extent of monitoring programs and management follow-up, including whether or not monitoring programs include triggers or thresholds for management action. Disclose whether or not the least protective management approach resulted in any adverse outcomes, and whether or not management actions were effectively modified. In cases where sensitive resource damage occurs, adopt more restrictive, preventative management approaches as a minimum standard and consider re-evaluating the appropriateness of this "least restrictive" policy direction.

Thank you for the opportunity to participate in the Pocatello Land and Resource Management Planning process. If you would like to discuss these comments or have any questions, feel free to contact Elaine Somers of my staff by email at somers.elaine@epa.gov or (206) 553-2966, or me at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager
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