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

May 23, 2007

Vicki L. Wood
Field Manager
Bureau of Land Management
El Centro Field Office
1661 South 4th Street
El Centro, CA 92243

Subject: Draft Environmental Impact Statement (DEIS) for the Eastern San Diego County Resource Management Plan (CEQ# 70065)

Dear Ms. Wood:

The 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.

The Resource Management Plan describes management of approximately 103,303 acres of Bureau of Land Management (BLM)-administered land in Eastern San Diego County, California. We recognize the need to balance resource use and protection of sensitive resources. EPA is supportive of alternatives that work to meet both of these goals. While we are supportive of many of the Best Management Practices and plans in the DEIS, we have concerns that should be addressed in the Final EIS (FEIS). Based on these concerns, we have rated the DEIS as EC-2, Environmental Concerns - Insufficient Information (see enclosed "Summary of Rating Definitions").

The DEIS analyses four action alternatives and one no action alternative. The alternatives differ in the management of cultural resources, livestock grazing, and public use. Alternative E is the preferred alternative and proposes a plan to balance mineral needs, as well as conservation needs in the area. Alternative E eliminates grazing in the BLM-managed planning area but does not protect Wilderness Study Areas (WSAs) and critical habitat from mineral entry like Alternative C.

Given the multiple uses of the land, and the need to understand the environmental trade-offs between various uses, there is a need for additional information in the Final EIS (FEIS) regarding air and water quality impacts, existing ecological conditions, and future monitoring plans. While EPA is pleased that an alternative has been selected that strives to meet both ecological and economical needs, the information in the DEIS is not sufficient to determine if the alternative selected best balances these competing interests.

In closing, EPA is supportive of renewable energy. We note that there is currently a wind energy test site with a 3-year interim Right of Way, encompassing 17,000 acres, and the Planning Area has been classified as one of the top 25 planning units with the highest potential for solar and wind resources in the Department of Energy's 2003 report, *Assessing the Potential for Renewable Energy on Public Lands*. The EIS notes that the BLM has received multiple inquiries regarding wind energy development in the Planning Area (p. 3-133). EPA looks forward to being involved with the environmental review of any future wind projects proposed for the area.

We appreciate the opportunity to review this DEIS and the measures BLM has taken to meet the multiple needs of the area. When the FEIS is released for public review, please send (1) copy to the address above (mailcode: CED-2). If you have any questions, please contact me at 415-972-3846 or Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847 or allen.summer@epa.gov.

Sincerely,

Nova Blazej, Manager
Environmental Review Office

Main ID # 4413
Enclosures: Summary of Rating Definitions
Detailed Comments

Water Quality

Although a Clean Water Act Section 404 permit is not needed for the proposed action, this document may serve as the basis for future permits. The DEIS notes that data collected in 1978 showed that four springs were in excess of, or approaching, the recommended limits of chloride and/or sulfate concentrations for livestock and wildlife consumption (p. 3-20). However, no more recent data on water quality is included in the document.

Recommendations:
The FEIS should include the most recent information on water quality in the Planning Area and determine if the project will exacerbate any water quality issues. The FEIS should include appropriate mitigation measures, as necessary.

Air Quality

San Diego County is designated as nonattainment for 8-hour ozone and within a maintenance plan for 1-hour ozone under the federal air standards and is designated as nonattainment for particulate matter less than 2.5 microns in diameter (PM2.5) and particulate matter less than 10 microns in diameter (PM10), by the state air standards. While the air emissions are estimated to be the same for all alternatives (p. 4-6), areas open to Off-Highway Vehicles (OHV) vary among alternatives. This is not accounted for in emissions estimates.

In addition, asbestos-bearing ultramafic rocks are found in at least 44 of California's 58 counties. Disturbance of rock and soil that contains asbestos can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen. The Draft EIS does not indicate whether naturally occurring asbestos (NOA) has been identified on BLM-managed lands within the Planning Area. We raise this concern because of the potential for NOA exposure to OHV users.

Recommendations:
The FEIS should document any potential changes in air emissions from excluding OHV use under Alternative C.

EPA recommends that the FEIS determine whether BLM-managed lands in the resource area are likely to have NOA. If these lands have NOA, we recommend that BLM evaluate existing trails and roads for sediment production and drainage in areas where NOA is likely to be present; conduct air analyses to determine the presence of NOA during common activities in the area; and, as appropriate, post signs informing users that NOA is present, what the risks are, and how users can avoid exposure.

Ecological Assessment and Monitoring Plan

This RMP will be in place for 15-20 years and will serve as the baseline for other planning and implementation documents for projects in the area. Therefore, it is important to establish a baseline record of the current ecological situation including the vegetation index and how this has been impacted by the uses in the area, potential erosion and sedimentation concerns in streams, and habitat quality. This will aid in determining how the biological resources in the area are responding to management practices and the need for further adjustments.

Recommendations:
The FEIS should provide a more detailed assessment of existing ecological conditions, including habitat values and functions, as well as a vegetation index that determines rangeland health, as this should form the basis of grazing management decisions. The FEIS should document the reasons for the proposed removal of grazing and OHV use for certain allotments. Given that the project will be reliant on adaptive management to respond to changes in wildlife impacts and vegetation and soils impacts, the FEIS should provide a monitoring timeline, identify a funding source, and include a description of how the results will be used to inform future adaptive management plans.