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

July 27, 2006

Rich Burns
Bureau of Land Management
2550 North State Street
Ukiah, CA 95482

Subject: Final Environmental Impact Statement (FEIS) for the Ukiah Field Office Proposed Resource Management Plan (RMP), California (CEQ #20060267)

Dear Mr. Burns:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document 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.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and Draft RMP and provided comments to the Bureau of Land Management (BLM) on December 30, 2005. The DEIS and Draft RMP provide direction for managing public lands within the Ukiah Field Office planning area, which covers approximately 300,000 acres separated into nine management areas. EPA had no objections to the Preferred Alternatives described for each resource within each management area and rated the DEIS and Draft RMP as LO (Lack of Objections).

The FEIS and Proposed RMP include Management Actions to address naturally occurring asbestos (NOA) within the jurisdiction of the Ukiah Field Office, including:

- Evaluating existing trails and roads for sediment production and air emissions in areas where NOA is likely to be present; and
- Posting signage to inform users that NOA is present in areas found to contain NOA in amounts greater than 0.25 percent (per specimen) or where airborne asbestos is found at hazardous levels.

Over the last two years, EPA has worked closely with BLM's Hollister Field Office to conduct asbestos air and soil sampling in the Clear Creek Management Area (CCMA), an off-highway vehicle recreation area where NOA is present. Based on the results of the sampling, the Hollister Field Office is making management decisions about the CCMA, including road and trail restrictions, seasonal closures, signage, and public outreach efforts. You may wish to contact the Hollister Field Office for more information on these issues in order to implement the Management Actions for NOA areas within the Ukiah Field Office jurisdiction.

In areas where NOA is likely to be present, proper design of your sampling protocol will be important. We refer you to EPA Regions 9's asbestos web page at http://www.epa.gov/region9/toxic/noa/ and the California Air Resources Board's (CARB) asbestos web page at http://www.arb.ca.gov/toxics/asbestos/asbestos.htm for useful information on NOA, including air monitoring. CARB's web site also addresses California's Asbestos Airborne Toxic Control Measures for Surfacing Applications, which apply to unpaved roads. EPA is also happy to assist your office in answering questions you may have regarding sampling protocols and how to inform users about the presence, risks, and avoidance of NOA in the area.

We appreciate the opportunity to review this FEIS and Proposed RMP. When the Record of Decision is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact Ann McPherson, the lead reviewer for this project, or Jeanne Geselbracht, the lead reviewer for the CCMA. Ann can be reached at 415-972-3545 or mcpherson.ann@epa.gov; Jeanne can be reached at 415-972-3853 or geselbracht.jeanne@epa.gov. My phone number is 415-972-3988.

Sincerely,

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division