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

October 15, 2012

Mr. Greg Hill
Project Manager
Bureau of Land Management
El Centro Field Office
1661 South 4th Street
El Centro, California 92243

Subject: Imperial Sand Dunes Proposed Recreation Area Management Plan/California Desert Conservation Area Plan Amendment and Final Environmental Impact Statement, Imperial County, California (CEQ#20120299)

Dear Mr. Hill:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Bureau of Land Management (BLM) on June 22, 2010. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns about the number of acres open to off-highway-vehicles (OHV) in the preferred alternative, and the potential impacts to air quality and sensitive resources from OHV use. We recommended that the BLM provide additional information on the preferred alternative's potential air quality impacts, and whether it would conform to the Imperial County Air Pollution Control District's State Implementation Plan for ozone and PM_{10}. We also recommended that the BLM provide additional information, in the FEIS, regarding how climate change may affect the Planning Area.

We continue to have concerns about the number of acres open to OHV use in the preferred alternative. At 127,416 acres, the proposed area open to OVH recreation would be almost 40,000 acres greater than under current management. This expansion could result in greater impacts to air quality, vulnerable species (such as the Mojave Desert tortoise and Peirson's Milk-vetch), and sensitive habitats, such as the microphyll woodlands.

The EPA is cognizant of the analyses conducted, after the DEIS was published, to quantify emissions from OHV activity, and we appreciated the opportunity to discuss these new assessments with BLM staff. Nevertheless, we remain concerned, particularly with the emissions caused after OHVs break desert crust or disrupt flora. ICAPCD's 2009 PM_{10} plan estimates that OHV activity just in the Imperial Sand Dunes area alone may cause as much as 0.9 tons of PM_{10} emissions per day (Table III.B.3), compared to the @100 tons/year estimated by Table 4.5 of the FEIS. These emissions of wind-blown dust from soil disrupted by OHVs are significant; measures should be included in the Record of Decision (ROD) to mitigate them to the greatest practicable extent. Similarly, while we acknowledge the measures included in the preferred alternative to protect sensitive resources, we remain concerned that the expanded OHV territory in the preferred alternative could result in increased impacts to sensitive

species and habitats, including the microphyll woodlands. In our DEIS comment letter, we commended the BLM for classifying microphyll woodlands as avoidance areas. We note, however, that the preferred alternative would open 15,246 acres of microphyll woodlands to OHV use, only slightly less than would Alternative 7, which would open the most such acres of any of the alternatives analyzed. We recommend that the BLM clarify, in the ROD, which microphyll woodlands would be managed as "avoidance areas" versus "open to OHV recreation." The EPA continues to support avoidance of sensitive resources to the extent possible.

Please note that, as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012 must be made through the EPA's new electronic EIS submittal tool: *e-NEPA*. To begin using *e-NEPA*, you must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at (415) 947-4221 or gerdes.jason@epa.gov.

Sincerely,

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FOR

Kathleen Martyn Goforth, Manager
Environmental Review Office (CED-2)