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

OCT 17 2011

Ms. Laura Olais
Acting Manager – Ironwood Forest National Monument
Bureau of Land Management
Tucson Field Office
12661 East Broadway
Tucson, Arizona 85748

Subject: Ironwood Forest National Monument Resource Management Plan and Final Environmental Impact Statement, Pima and Pinal Counties, Arizona (CEQ# 20110318)

Dear Ms. Olais:

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 on May 23, 2007. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns regarding environmental impacts from off-highway vehicles (OHVs), particularly in non-attainment areas; livestock grazing; and mining. We recommended selecting Alternative B, identified in the DEIS as the most environmentally protective alternative. We also recommended restricting OHV use in non-attainment areas and implementing mitigation measures to reduce the air quality impacts from OHV use.

We continue to believe that Alternative B, identified in the FEIS as the "preservation" alternative, would be the most environmentally protective alternative. In our DEIS letter, our major concern regarded potential air quality impacts, particularly from OHV use, if the preferred alternative (Alternative C) were to be adopted. The reason for our concern was primarily OHV use and the generation of particulate emissions (PM_{10}) in non-attainment areas. While we acknowledge that all action alternatives represent an improvement to existing conditions, and that, as indicated in your response to our comments in the FEIS, "the PM10 non-attainment area was considered in the route evaluation process and motorized vehicle route designations were minimized in this area," implementing Alternative C would result in greater overlap of designated routes in PM_{10} non-attainment areas and higher PM_{10} emissions than Alternative B. Alternative B, by placing more restrictions on motorized travel throughout the planning area, would provide the greatest protection to sensitive resources. We ask that BLM consider a route network more closely aligned with that identified in Alternative B when developing the Record of Decision for this Plan.

The FEIS addresses the major issues pertaining to potential livestock grazing and mining impacts identified in our review of the DEIS. The EPA thanks the BLM for the additional information provided in the FEIS regarding mining activities in the planning area, as well as the differences between Areas of Critical Environmental Concern and Vegetation Habitat Management Areas. Additionally, we commend the BLM for including an adaptive management plan for threatened and endangered species in the FEIS.

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,

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