Reading File

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

September 8, 2008

Connie Stone, RMP Team Lead
Bureau of Land Management
21605 North 7th Avenue
Phoenix, AZ 85027

Subject: Final Environmental Impact Statement (FEIS) for the Agua Fria National Monument and Bradshow-Harquahala Resource Management Plan (RMP), Arizona (CEQ # 20080300)

Dear Ms. Stone:

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. Our detailed comments are enclosed.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Bureau of Land Management (BLM) on April 4, 2006. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) because of potential concerns regarding the existing health of riparian resources in the planning area, and impacts to air quality from off-highway vehicle use in areas that currently do not meet air quality standards for particulate matter less than 10 microns (PM10). EPA recommended additional protections for these resources be included in the Final EIS.

While BLM did not designated the Agua Fria Riparian Corridor as an Area of Critical Environmental Concern (ACEC), which would have provided additional protection, BLM did complete its analysis determining that eight Agua Fria tributaries are eligible for Wild and Scenic River (WSR) consideration. Suitability analysis will be conducted in the future as funding becomes available, and recommendations will be made to Congress based on the results of the analysis. The FEIS states that BLM will preserve the tributaries' free-flowing condition and protect their outstandingly remarkable values regardless of these results. Additionally, BLM is no longer considering designating the Bloody Basin Road as a Back Country Byway, which will help prevent water quality degradation and protect WSR values.

Impacts to air quality from PM10 emissions will be addressed through an adaptive management approach. This approach will allow an increase to 8 competitive off-highway vehicle (OHV) races per year, up from the existing 3 races/year. However, the FEIS states that BLM will only authorize motorized speed events when they are in compliance with Maricopa County air quality regulations including fugitive dust rules, and notes that an Air Quality Compliance Plan will subsequently be prepared to determine the appropriate means of

complying with the rules. Additionally, the FEIS indicates that an Air Quality General Conformity analysis will be conducted after the Record of Decision is signed but before additional OHV activities are authorized.

Since this is a programmatic document, EPA has no objections to the proposed project, but encourages BLM to pursue appropriate mitigation during the implementation stage and to utilize its adaptive management approach for the protection of the valuable resources in the Phoenix District.

EPA appreciates the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

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