



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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**JUL 28 2016**

Ref: 8EPR-N

Collin Ewing, NCA Manager  
Dominquez-Escalante National Conservation Area  
Bureau of Land Management  
2815 H Road  
Grand Junction, Colorado 81506

Re: Dominquez-Escalante National Conservation Area Proposed Resource Management Plan and Final Environmental Impact Statement; CEQ # 20160144

Dear Mr. Ewing:

The U.S. Environmental Protection Agency Region 8 has reviewed the Bureau of Land Management's (BLM) Dominquez-Escalante National Conservation Area (D-E NCA) Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS). Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA).

### **Project Background**

The D-E NCA was designated under the Omnibus Public Lands Management Act of 2009 (Omnibus Act) to provide for long-term conservation and protection of unique and important resources and values. These resources and values identified in the Omnibus Act include the geological, cultural, archaeological, paleontological, natural, scientific, recreational, wilderness, wildlife, riparian, historical, educational, scenic, and water resources of the public lands. The D-E NCA planning area includes 218,393 acres of private, state and federal surface lands in Mesa, Montrose and Delta Counties located between Grand Junction and Delta, Colorado. The BLM currently manages 210,172 acres of public lands within the D-E NCA planning area in accordance with the 1987 Grand Junction RMP, as amended, and the 1989 Uncompahgre Basin RMP, as amended. When the D-E NCA RMP is finalized, management will be guided exclusively by this new RMP and not through the BLM's RMP revisions for the Grand Junction or the Uncompahgre Field Offices.

The PRMP/FEIS describes and analyzes five alternatives for managing resources. Alternative A (the No Action Alternative) would continue current management direction. Under Alternative B, the BLM would rely on natural processes and restrictions on allowable uses to conserve and protect the resources of the D-E NCA. Under Alternative C, the BLM would use active management for biological restoration and cultural resource protection. Under Alternative D, the BLM would make a commitment to trail-based recreation and specific recreation outcomes and settings. And finally, the Proposed Plan Alternative is largely based upon Alternative E (the Preferred Alternative), which was a blend of management approaches considered under the other alternatives. Management actions unique to the Proposed Plan Alternative were crafted in response to public comments on the Draft RMP to better address conflicts and impacts, and provide for greater clarity.

Under the Proposed Plan Alternative, one Wild and Scenic River (WSR) segment on Cottonwood Creek would be managed as suitable for WSR designation, two new Areas of Critical Environmental Concern (ACEC) would be established, and the BLM would continue to manage two existing ACECs. A 23,131-acre trail corridor would be established for the Old Spanish National Historic Trail. Of all the alternatives, the Proposed Plan has the second largest number of miles of routes that would be open to the public.

The PRMP/FEIS states that the Proposed Plan Alternative replaces the Preferred Alternative (Alternative E), which suggests that the new Preferred Alternative is the Proposed Plan Alternative. However, the PRMP/FEIS does not clearly identify the Preferred Alternative; we recommend this be clarified in the final RMP.

### **Comments and Recommendations**

Our comments on the Draft RMP/EIS focused on the following issues: (1) groundwater resources; (2) surface water resources; (3) riparian habitat; (4) source water protection and public drinking water supply; (5) potential measures to protect water resources from impacts due to grazing; and (6) water resources best management practices (BMPs). The additional data provided in the PRMP/FEIS illustrate the efforts of the BLM to address many of the EPA's and the public's concerns. The PRMP/FEIS provides more explicit details to further support the analysis and increases understanding of the project and affected environment to better inform stakeholders about potential project impacts.

We acknowledge the expanded discussion on groundwater and surface water resource characterization in the PRMP/FEIS. The document includes details in various sections that cover topics such as aquifers, wells, state water quality standards and an assessment of water quality within the D-E NCA, as well as climate and climate change. The additional information adds value to the NEPA document by more accurately representing existing conditions in the planning area. We also note the changes made in the PRMP/FEIS to BMPs, particularly BMP No. 32 and No. 35. These provide for more protection of water resources by adjusting livestock management practices as well as timing of work in wetlands and watercourses to occur during low flow conditions rather than during times of high flows, including snowmelt runoff. Further, there are seasonal limits and other BMPs that will be implemented under the Proposed Plan that will protect water resources from impacts due to grazing and other land use activities.

Based on our review, we note that some of the EPA's recommendations were not addressed in the PRMP/FEIS. We understand that some of the information that we requested was not made available to the BLM, and we appreciate the surrogate information that was provided in the PRMP/FEIS. In other instances, the BLM states that the request is better addressed at the project level, and is beyond the scope of the RMP. We understand that impact analyses can often be more accurate and meaningful at the project level. We also continue to recommend that conducting certain impact analyses at this programmatic stage of the NEPA planning is useful because such information, even when less precise, can inform resource management decisions.

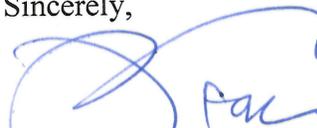
One particular example is the sediment load analysis that was suggested in our previous comment letter. Fragile, erodible soils are a concern regarding both soil productivity and water quality, and represent a significant source of pollutants in the planning area. The Proposed Plan Alternative has more routes that would be designated for public use than any other action alternative, and therefore has greater potential for erosion and sediment delivery. By including estimates of erosion rates by alternative in areas where fragile or erodible soils are present, potential impacts of soil disturbance would be more fully understood

in order to plan for trail locations and effective mitigation. Prior to project implementation, we continue to recommend that the BLM consider using the Water Erosion Prediction Project model (WEPP), a web-based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at <http://ars.usda.gov/Research/docs.htm?docid=10621>. The Wyoming BLM's Bighorn Basin RMP/EIS serves as an example where erosion rates were estimated using this model based on the projected amount of surface disturbance, types of surface disturbance and general characteristics of the basin (erodible soils, slopes, etc.).

### **Closing**

The BLM adapted the new Proposed Plan Alternative and associated management actions in response to public and agency comments and to provide for greater clarity. We appreciate the opportunity to review the PRMP/FEIS. Thank you for considering our input. If you have any questions during this stage of your planning process, please contact Melanie Wasco of my staff at (303) 312-6540. Alternatively, I can be reached at (303) 312-6704.

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

