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

January 11, 2006

George Hill
Hollister Field Office
Bureau of Land Management
20 Hamilton Court
Hollister, CA 95023

Subject: Draft Resource Management Plan/Draft Environmental Impact Statement (EIS) for the Southern Diablo Mountain Range and Central Coast of California
[CEQ# 20050425]

Dear Mr. Hill:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

This Resource Management Plan (RMP) establishes policies, objectives, and guidance for managing the planning area over the next ten to 20 years, and identifies actions that BLM will take to manage the area accordingly. In general, the Preferred Alternative (Alternative C) presents numerous opportunities to maintain and improve resources in the planning area. It appears several additional opportunities exist for improving and monitoring resources, which we recommend BLM incorporate into Alternative C. We have rated this Draft EIS as EC-2 – Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions and Follow-Up Action"). Our rating reflects our concerns that additional measures should be taken to reduce impacts to human health, and watershed and vegetation resources. We recommend the Final EIS include additional management measures to reduce impacts. Our detailed comments are enclosed.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is officially filed with our Washington, D.C., office. If you have any

questions, please call me at (415) 972-3988, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/S/
Duane James, Manager
Environmental Review Office

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Enclosures: EPA Detailed Comments
Summary of Rating Definitions and Follow-Up Action

Southern Diablo Mountain Range and Central Coast of California Draft EIS
EPA Comments – January, 2006

Naturally Occurring Asbestos

Asbestos-bearing ultramafic rocks are found in at least 44 of California's 58 counties. Disturbance of rock and soil that contains asbestos can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen. The Draft EIS does not indicate whether naturally occurring asbestos (NOA) has been identified on BLM-managed lands in the Hollister Field Office Planning Area outside of the Clear Creek Management Area (CCMA). It appears that ultramafic rocks, which are more likely to contain NOA, may occur on BLM lands just west of the CCMA and BLM lands northwest of Panoche Hills.[1]

Recommendation: EPA recommends that BLM determine whether BLM-managed lands in the resource area (outside of the CCMA) are likely to have NOA. If these lands have NOA, we recommend that BLM:

- Evaluate existing trails and roads for sediment production and drainage in areas where NOA is likely to be present;
- Conduct air analyses to determine the presence of NOA during common activities in the area; and
- Post signs informing users that NOA is present, what the risks are, and how users can avoid exposure.

EPA will be happy to assist your office in developing signage for these areas. These measures should be incorporated into the Preferred Alternative in the Final EIS and committed to in the Record of Decision (ROD).

Soil and Watershed Resources

The water management actions common to Alternatives B, C, and D address managing impaired water bodies to meet properly functioning condition objectives relative to beneficial uses and total maximum daily loads (TMDLs). However, monitoring of intermittent or perennial streams is not specified. Management Action WAT-COM8 only involves periodically monitoring water quality in seasonal pools and perennial ponds containing threatened or endangered species, identifying water quality issues, and initiating repairs. In order to properly manage streams to protect beneficial uses, meet TMDLs, and limit activities to those that do not adversely affect water quality and watershed function, these waters must also be monitored. Water quality monitoring helps identify problem areas and trends, which can be used to determine necessary corrective measures.

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[1] California Division of Mines and Geology: A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos, Open-File Report 2000-19. (ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/ofr_2000-019.pdf)

Recommendation: We recommend the Preferred Alternative include water quality monitoring of streams and that BLM use this information to develop corrective measures. We suggest you work closely with the California Regional Water Quality Control Boards to determine priority watersheds for monitoring, identify monitoring needs, and develop specific water resource management activities in the planning area. These management actions should be identified in the Final EIS and committed to in the ROD.

Where grazing allotments do not meet the rangeland health standards and guidelines (S&G) because of livestock, the Preferred Alternative includes developing allotment management plans to bring allotments into compliance (Management Action RANG-C3). Management Action RANG-C7 would also allow grazing on allotments not in compliance with S&G where livestock is not the cause. The Preferred Alternative does not address improving allotments that do not meet S&G for reasons other than livestock (e.g., water quality, species diversity). Even where livestock is not the cause of failure to meet S&G, BLM should protect and improve rangeland health. In addition, Management Action WAT-C1 directs BLM to manage all fluvial systems functioning at risk to meet proper functioning condition

Recommendation: We recommend the Preferred Alternative include a Management Action, such as RANG-B6, specifying that BLM will develop allotment management plans to bring all allotments not meeting rangeland health S&G into compliance. This management action should be identified in the Final EIS and committed to in the ROD.

Under the Preferred Alternative, grazing would be allowed on land inside and outside grazing allotments not in compliance with the S&G where livestock grazing is not the cause (Management Actions RANG-C5, C6). Even where grazing is not considered to be the cause of failure to meet the S&G, additional grazing on newly acquired lands could result in additional stresses on the watershed and rangeland health. Impacts to water quality can result from changes in the pattern and timing of runoff, increased sediment loads from loss of vegetative cover, streambank trampling, bacterial contamination, and increased nutrient levels. It is unclear whether rangeland health assessments would be required before decisions are made to allow additional grazing on newly acquired lands.

Recommendation: We recommend that BLM examine rangeland health on newly acquired lands before allowing grazing there, including examining how adding livestock could affect the health of the ecosystem. This management action should be identified in the Final EIS and committed to in the ROD.

Under the Preferred Alternative, vehicle use within riparian areas is not restricted. Riparian areas directly affect many of the designated beneficial uses of streams, as they play a key role in defining channel morphology, creating fish habitat, controlling the

amount of sediment and nutrients reaching the stream channel from upslope sources, and affecting temperature.

> **Recommendation:** We recommend that the Preferred Alternative include a Management Action such as TRANS-B3: Prohibit vehicle use within riparian areas except at designated crossings. This management action should be identified in the Final EIS and committed to in the ROD.

Vegetation Management

We note that, under the Preferred Alternative, BLM could rehabilitate vegetative cover following wildland fires and/or other surface-disturbing activities using non-invasive, non-native species (Management Action VEG-C1). We understand this would allow flexibility to conduct revegetation and stabilization of the area in a timely manner if local genotypes of native species are not readily available.

> **Recommendation:** We encourage BLM to conduct initial revegetation with local genotypes of native species if they are available at that time. In addition, if local genotypes of native species are not available during initial restoration efforts, BLM should consider conducting follow-up restoration with such seeds and seedlings if they become available within a reasonable time frame.

We concur with BLM's decision to use integrated pest management (IPM) as a vegetation management approach, and encourage you to expand IPM as much as possible in the planning area.