



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

June 27, 2012

Mr. Chris Horyza RMP Project Manager LS-SDNM Resource Management Plan BLM Phoenix District Office 21605 North 7<sup>th</sup> Avenue Phoenix, Arizona 85027

Subject: Lower Sonoran and Sonoran Desert National Monument Proposed Resource Management Plan and Final Environmental Impact Statement, Arizona (CEQ#20120186)

Dear Mr. Horyza:

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 November 22, 2011. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns about how emissions generated in the Planning Area may affect the State Implementation Plans for the nonattainment areas that fall within lands administered by the BLM. We recommended that the BLM describe how emissions generated under the preferred alternative will conform to the applicable SIPs. We also recommended that the Final EIS provide additional information describing the potential for the development of renewable energy and transmission lines, the identification and remediation of abandoned mines, and the resources required for monitoring and enforcement of grazing allotments. Additionally, we recommended the BLM include strategies within the adaptive management plan to account for, minimize, and mitigate the effects of climate change.

The FEIS addresses our concerns pertaining to air emissions generated within the Planning Area. The EPA commends the BLM for requesting an air quality general conformity evaluation and including the report in the FEIS. Additionally, we thank the BLM for the the additional information provided in the FEIS regarding renewable energy development within the Planning Area, abandoned mines, and the monitoring and enforcement of grazing allotments. Additionally, we commend the BLM for revising Chapter 4 in the FEIS to include a qualitative analysis for climate change. We recommend that the RMP adaptive management plan include a section to account for, minimize, and mitigate the effects of climate change.

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,

/s/

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