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

December 19, 2011

Mr. Greg Hill
RMP Team Lead
South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, California 92262

Subject: South Coast Draft Resource Management Plan and Environmental Impact Statement, San Diego, Riverside, San Bernardino, Orange, and Los Angeles Counties, California (CEQ# 20110321)

Dear Mr. Hill:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the South Coast Draft Resource Management Plan pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA commends the BLM for developing a broad range of alternatives for sustainably managing the Planning Area, and is pleased that so many protective measures have been incorporated into the preferred alternative, Alternative D. These measures, coupled with the emphasis placed on coordination with regional habitat conservation planning, should serve as crucial safeguards for sensitive resources.

Based on our review of the Draft RMP/EIS, we have rated the preferred alternative and the document as EC-2, Environmental Concerns – Insufficient Information (see enclosed EPA Rating Definitions). The EPA is concerned with how emissions generated on BLM lands would affect the State Implementation Plans (SIP) for the nonattainment areas located within the Planning Area. We recommend that the Final EIS provide additional information on these projected emissions, the potential for enhanced oil and gas recovery through hydraulic fracturing, the development of renewable energy and transmission lines, and the effects of climate change on sensitive species. Additionally, we recommend the BLM include a climate change mitigation and adaptation plan within the RMP/EIS to account for, minimize, and mitigate the effects of climate change. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: CED-2). 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

Enclosure: Summary of the EPA Rating System

U.S. EPA DETAILED COMMENTS ON THE SOUTH COAST DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, SAN DIEGO, RIVERSIDE, SAN BERNARDINO, ORANGE, AND LOS ANGELES COUNTIES, CALIFORNIA, DECEMBER 19, 2011

Air Quality

The EPA believes that the Draft RMP/EIS contains insufficient information to evaluate and disclose potential impacts to air quality (including cumulative and indirect impacts) and air quality related values for all the National Ambient Air Quality Standards for each fully evaluated alternative. The South Coast Planning Area encompasses portions of four air basins (Mojave, Salton Sea, San Diego, and South Coast) that are regulated by four air pollution control districts or air quality management districts (Antelope Valley AQMD, Mojave Desert AQMD, San Diego APCD and South Coast AQMD). These basins are in nonattainment for a variety of federally classified criteria pollutants, including ozone and $PM_{2.5}$ and PM_{10}. The DEIS includes a general description of how federal actions conform to State Implementation Plans (SIP), and provides a qualitative account of activities in the Planning Area that generate air pollutants, but does not state whether a general conformity determination has been made for the preferred alternative, and if so, whether it conforms to the SIPs for the air basins contained within the Planning Area.

***Recommendations*:**

- Clarify in the Final RMP/EIS the General Conformity regulatory framework and how it applies to the proposed RMP and future project-specific implementation. The Final RMP/EIS should demonstrate conformity for all pollutants for the air basins within the Planning Area that are in nonattainment or maintenance status, and whose construction or operational emissions would exceed the applicable de minimis levels. Conformity may be demonstrated by showing that the total direct and indirect emissions from the action are specifically identified and accounted for in the SIP.
- If analysis of general conformity to the SIP is more appropriate at the project-specific analysis level, we recommend the Final RMP/EIS include a specific commitment to future project-specific general conformity analysis.

Mitigation

In light of the poor air quality in the majority of the Planning Area, the EPA recommends the Final RMP/EIS include commitments to aggressive air quality mitigation measures during future project-specific construction. Future construction-related emissions of nitrogen oxides, a precursor for ozone and secondary PM formation, and direct PM could exacerbate nonattainment air quality standards and contribute to adverse cumulative air quality impacts. Mitigation measures will be necessary to reduce these construction emissions.

The EPA supports incorporating mitigation strategies to minimize fugitive dust emissions, as well as emission controls for PM and ozone precursors for construction-related activity. In addition to all applicable local, state, or federal requirements, the EPA recommends that the following mitigation measures be included in project-specific Construction Emissions Mitigation Plans in order to reduce impacts associated with emissions of PM, NOx, ROGs and other toxics from construction-related activities:

***Recommendations*:**
Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions;
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and
- Prevent spillage when hauling material and operating non-earthmoving equipment and limit speeds to 15 miles per hour. Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Plan construction scheduling to minimize vehicle trips;
- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections (Note: The California Air Resources Board has a number of mobile source anti-idling requirements, see their website at: http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm);
- Maintain and tune engines per manufacturer's specifications to perform at CARB and/or EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal[1] or State Standards[2]. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible[3];
- Lacking availability of non-road construction equipment that meets Tier 4 engine standards, the responsible agency should commit to using CARB and EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site; and
- Consider alternative fuels such as natural gas and electricity (plug-in or battery).

Administrative controls:

- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking;
- Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips; and
- Identify sensitive receptors in the project area, such as children, elderly, and infirmed, and specify the means by which you will minimize impacts to these populations (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).

Hydraulic Fracturing

Many of the oil fields in California, including those located in the South Coast Planning Area, are past their peak production rates, with many nearing the end of the reserves that can be extracted economically. However, due to higher oil prices and new technologies, enhanced oil recovery techniques and horizontal drilling could significantly increase the percentage of oil recovered profitably.

[1] EPA's website for nonroad mobile sources is http://www.epa.gov/nonroad/.
[2] For ARB emissions standards, see: http://www.arb.ca.gov/msprog/offroad/offroad.htm.
[3] Diesel engines < 25 hp rated power started phasing in Tier 4 Model Years in 2008. Larger Tier 4 diesel engines will be phased in depending on the rated power (e.g., 25 hp - <75 hp: 2013; 75 hp - < 175 hp: 2012-2013; 175 hp - < 750 hp: 2011 - 2013; and ≥ 750 hp 2011- 2015).

The Draft RMP/EIS does not specify whether hydraulic fracturing will be utilized, nor does it assess the number of wells that presently, or in the future, would utilize hydraulic fracturing.

The Final RMP/EIS should fully discuss the extent to which hydraulic fracturing may be utilized and the areas where such activity could take place. The potential long-term impacts of dewatering and hydraulic fracturing to groundwater and potential sources of drinking water could be severe if not managed appropriately. Contamination associated with hydraulic fracturing in the Planning Area could threaten the suitability of the aquifers for future use.

***Recommendations*:**

- Discuss, in the Final RMP/EIS, the potential use of hydraulic fracturing in future well drilling under each alternative, including the no action alternative.
- Analyze the potential impacts to groundwater resources in areas where hydraulic fracturing may occur.
- Incorporate, into the Final RMP/EIS, all measures to ensure groundwater resource protection from hydraulic fracturing, and describe any steps necessary to ensure BLM incorporates such measures into its permits.
- Identify, in the Final RMP/EIS, the potential future requirements applicable to operators for gathering information on water quality and depth of useable groundwater, and subsequently complying with protective requirements, as appropriate.

Climate Change

The DEIS provides only limited information about the greenhouse gas (GHG) emissions that would be generated in the Planning Areas once the Resource Management Plan is implemented. This is a concern, because both Executive Order 13514 and Secretarial Order No. 3289, among other directives, have charged the BLM with accounting for, and reducing, emissions resulting from federal land management practices, and considering and analyzing potential climate change impacts when developing multi-year management plans. Considering that the RMP, once implemented, will guide resource management decisions in the Planning Area for years to come, the BLM should choose an alternative that minimizes and mitigates GHG emissions to the greatest reasonable extent.

The DEIS also provides little detail about how climate change may affect the Planning Area. In the section labeled "Global Climate Change" on page 3-6, the BLM states that climate change may impact future water supplies and increase the "intensity and frequency of extreme storm events," and later, on page 4-213, that climate change could "increase the potential for wildland fires in frequency and intensity." There are no detailed descriptions, however, of how potential climate change effects, including the expected decreases in surface and groundwater, and warming of the Planning Area (which is stated in the DEIS as a potential statewide average temperature increase of 3 to 10.5 degrees Fahrenheit by 2100), may affect the 62 special status species that are known or suspected to occur on BLM lands. The EPA believes that the long duration of this management plan (most likely two or three decades), and the extreme warming anticipated to occur in the Planning Area, warrants a climate change mitigation and adaptation plan to account for, minimize, and mitigate the effects of climate change.

Recommendations:

The BLM should consider whether a quantitative comparison of projected GHG emissions for the preferred alternative, as well as the other alternatives, would be useful to decision-makers and the public, and, if so, include this information in the Final EIS. The FEIS should also identify options for minimizing and mitigating greenhouse gas emissions.

The Final RMP/EIS should discuss the applicability of, and utilize as appropriate, the climate change and carbon tools highlighted by the Forest Service's Climate Change Resource Center. Additional information at: http://www.fs.fed.us/ccrc/tools/

The BLM should describe how climate change may affect Planning Area sensitive species, and include a climate change mitigation and adaptation plan in the Final RMP/EIS.

Development of Renewable Energy and Transmission Lines

The South Coast Planning Area has been identified as a region of considerable renewable energy potential, particularly wind. The DEIS states on page 3-129 that the BLM has "already received numerous inquiries for wind energy development." The Planning Area is also characterized in the DEIS as having moderate to high potential for geothermal resources. For solar, the DEIS states that "no inquires or applications regarding the development of solar energy have been submitted for public lands in the South Coast Planning Area." It is still unclear, however, what the renewable energy development scenario is for the Planning Area, and how this potential development may be informed by the BLM/DOE Solar Energy Development Programmatic EIS and the Desert Renewable Energy Conservation Project (DRECP).

Recommendation:
The EPA recommends that the BLM provide additional information in the Final RMP/EIS detailing the suitability of the South Coast Planning Area for renewable energy development, anticipated renewable energy and transmission projects (both pending, and reasonably foreseeable), and how changes resulting from the Solar Programmatic EIS and the DRECP will be incorporated into the South Coast RMP/EIS.