

US EPA ARCHIVE DOCUMENT



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

July 24, 2013

Mr. Bob Edwards  
Lahontan Basin Area Office  
U.S. Department of the Interior  
Bureau of Reclamation  
705 North Plaza Street, Room 320  
Carson City, Nevada 89701

Subject: Newlands Project Draft Resource Management Plan and Environmental Impact Statement, Churchill, Lyon, Storey, and Washoe Counties, Nevada (CEQ# 20130156)

Dear Mr. Edwards:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Newlands Project 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 Bureau of Reclamation (Reclamation) for developing a broad range of alternatives for sustainably managing the planning area, and is pleased that many protective measures have been incorporated into the Preferred Alternative. These measures, including prohibiting off-road vehicle operation except by special use permit, prohibiting mineral development in wetlands, wildlife areas, and riparian habitats, and designating sensitive biological, cultural, and hazardous areas as exclusion or avoidance zones, should serve as crucial safeguards for planning area resources.

Based on our review of the Draft RMP/DEIS, we have rated the Preferred Alternative and the document as *Lack of Objections – Adequate* (LO-1) (see the enclosed “Summary of EPA Rating Definitions”). Reclamation has done a commendable job addressing the two main rationales for updating the Newlands RMP: to identify and analyze the relinquishment of non-essential Reclamation-administered lands, and to develop and implement a grazing management plan for the pastures currently hosting livestock activities that will remain under Reclamation management.

The Draft RMP/EIS clearly describes the need for a robust grazing management plan, both to address pervasive, long-term damage from livestock within the planning area, and to ensure that future grazing activities comport with Reclamation Manual Directives and Standards as well as with requirements under NEPA. The Draft Grazing Management Plan (Plan) contains a number of critical components, including evaluations of land health conditions on all pastures where grazing is currently permitted; protections for riparian areas, soils, and special status species; and monitoring requirements, all of which should, over time, restore rangeland health within the planning area.

The EPA recommends that, in addition to the proposed Plan, Reclamation adopt the recommendations identified by Forest Service staff during a 2009 assessment of grazing areas in the Newlands Project planning area, and incorporate them into the pasture plans that will be prepared for grazing areas that

will be retained by Reclamation. Implementation of these recommendations, including closing reseeded pastures a minimum of two years, changing the season of use, developing rotation systems, allowing several years of rest for smaller pastures, and implementing utilization limits, should hasten the recovery of Reclamation lands long-stressed from livestock activities.

We also recommend that the Final RMP/EIS include additional information on how climate change may affect planning area resources and future Newlands Project management decisions. The Draft RMP/EIS provides little detail about how climate change may affect the planning area. The EPA believes that the long duration of this management plan (most likely two or three decades), and the warming anticipated to occur in the planning area, as described in the Draft RMP/EIS, warrants the inclusion of a climate change mitigation and adaptation plan in the Final RMP/EIS.

We appreciate the opportunity to review this Draft RMP/EIS, and are available to discuss our comments. When the Final RMP/EIS is released, please send one CD copy to this office. If you have any questions, please contact me at 415-972-3521, or contact Jason, the lead reviewer for this project. Jason can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

/s/

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions