



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Wyoming State Office

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IN REPLY REFER TO:

1610 (930)

Casper Resource Management Plan

NOV 28 2007

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202

Dear Mr. Svoboda:

Thank you for providing comments on the Proposed Casper Resource Management Plan (RMP) and Final Environmental Impact Statement (FEIS). Your letter provided four comments. Attached is a summary of your comments along with the Bureau of Land Management's (BLM) response to each comment.

We appreciate your interest and involvement in the BLM planning process. We also wish to express our thanks for the efforts of your staff and valuable input provided as a cooperating agency in this process. The BLM looks forward to continuing our collaborative partnership during implementation of the Casper RMP.

If you have any questions, or wish to discuss any issues or concerns regarding the plan, please call Jim Murkin, Casper Field Manager, at 307-261-7600, or Jane Darnell, Deputy State Director for Resources Policy and Management, at 307-775-6113.

Sincerely,

Robert A. Bennett
State Director

Attachment

Casper Resource Management Plan

Comment 1: “EPA acknowledges BLM’s commitment to using dispersion modeling to estimate the impacts of emissions from specific projects. We note that quantitative air quality analyses will take on added importance if BLM contemplates exercising categorical exclusion 3 under section 390 of the 2005 Energy Policy Act in the Casper planning area. Although BLM expects energy development in the planning area to be comparatively moderate, EPA would be concerned if concentrated development took place on federal lands without a quantitative assessment of potential air quality impacts.”

Response: A categorical exclusion under Section 390(b)(3) of the Energy Policy Act will apply to drilling an oil or gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as a reasonably foreseeable activity, so long as such plan or document was approved within five (5) years prior to the date of spudding the well. Any mitigation measures required as part of the Casper RMP as well as measures developed as a result of the site-specific environmental review will be incorporated as appropriate into the project. The specifics for processing APDs will be addressed in the implementation strategy to be developed collaboratively with RMP cooperators.

Comment 2: “While EPA is satisfied that the FEIS includes some management actions to minimize OHV impacts, we note that Preferred Alternative E limits OHV us to “designated roads and trails” in only about 15 percent of the planning area, with most all of the remaining 85 percent managed under a less-restrictive “existing roads and trails” designation. EPA recognizes that this represents a more protective management alternative than Alternative A. However, considering that BLM has identified an increase in OHV use in the Casper planning area as a specific “management challenge,” EPA recommends that future management decisions, including the adoption of more restrictive OHV use designations, strive to minimize adverse impacts to the extent practicable.”

Response: As discussed in Record # 6039 and 6074, travel management planning is on-going and will be completed within 5 years of signing the ROD for the Approved Plan. As discussed on Pages R-6/7 of Appendix R, regardless of the OHV-use designation, travel management planning will consider protection of soil, wildlife, cultural, and vegetative resources. Roads or trails that do not support a management objective may be eliminated.

Comment 3: “BLM’s response to EPA’s comments on the adequacy of wetlands information in the DEIS references general data on lotic and lentic habitat and condition and a statement in the planning criteria that “decisions in the revised RMP will comply, as appropriate, with all applicable laws, regulations, policy, and guidance.” While EPA finds these and other FEIS sections on the protection and enhancement of riparian and wetland habitats reassuring in a general sense, we note that no maps identifying wetland locations and functions are provided. Ultimately, the sound management of wetland resources will require more detailed information about both riparian and non-riparian wetlands. Although not included in the FEIS, EPA assumes that type of information will be developed and consulted as specific management decisions are made.”

Response: The BLM agrees that sound management of wetland resources requires more detailed information about both riparian and non-riparian wetlands is needed at the project level than is presented in the PRMP/FEIS. However, as discussed in the response to your comment on this issue, no map was provided in the Draft or Final EIS because most of the segments containing wetland resources are short and constitute only a fraction of a stream, making it difficult to depict on a map at the scale used in a planning document. This type of detailed information will be developed during the site-specific NEPA analysis of proposed projects.

Comment 4: “As we have stated before, EPA recognizes the complexity of the proposed multiple resource management actions and the large geographic scale of this RMP. EPA supports BLM’s intention to update the plan based on emerging issues and changing circumstances. We expect that OHV use and wetlands protection will be among the issues and circumstances monitored as the plan is implemented.”

Response: After issuing the Approved RMP and ROD, an Implementation Strategy will be developed. This strategy will include a monitoring strategy. Your comment will be considered during development of the strategy. Also, please note the Implementation Strategy will include an annual coordination meeting between BLM and Cooperating Agencies involved in revising the RMP. The annual coordination meeting will include an update on implementation of the plan, foreseeable activities for the upcoming year, and opportunities for continued collaboration with the RMP cooperators.