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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 8**

**999 18<sup>TH</sup> STREET- SUITE 300**  
**DENVER, CO 80202-2466**  
**Phone 800-227-8917**  
**<http://www.epa.gov/regionOS>**

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CASPER FIELD OFFICE  
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Ref: EPR-N

OCT 12 2006

Linda Sloan, RMP Project Manager  
Bureau of Land Management Casper Field Office  
2987 Prospector Drive  
Casper, WY 82604-2968

RE: Draft Resource Management Plan and  
Environmental Impact Statement for the  
Casper Field Office Planning Area

Dear Ms. Sloan,

In accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed and is providing comments on the Draft Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS) for the Casper Field Office Planning Area in east-central Wyoming.

The planning area includes 8.5 million acres of land in most of Natrona County, and all of Converse, Goshen and Platte Counties. Within the Casper planning area, the BLM administers approximately 1.4 million acres of public land surface and 4.7 million acres of federal mineral estate. When approved, the Casper RMP will replace the 1985 Platte River RMP. EPA's review of this document will focus on BLM's response to EPA's comments on the Preliminary Draft RMP/EIS.

In addition to the No Action Alternative (Alternative A), the Draft EIS examined four other alternatives representing different approaches to managing resources and resource use in the planning area. Alternative B emphasizes conservation of physical, biological and heritage resources with major constraints on resource uses. Alternative C is very similar to current management but with additional restrictions. Alternative D emphasizes resource uses, including energy and minerals, grazing, recreation and forest products, while lessening some resource conservation measures relative to current management. Conversely, Alternative E (Preferred Alternative) places more restrictions on OHV use, livestock grazing, wind-energy development, and leasing for oil and gas and other leased minerals, relative to current management.

EPA requested that the Appendices in Volume II include a map and description of existing wetlands in the planning area, including their acreage, type and ecological role, and how both acreage and function will be protected. The response to comments indicates that Map 19, Vegetation Resources for Riparian Areas would fulfill that request. However, Map 19 is Fire Management and Ecology for All Alternatives. Map's 5 (Physical Resources Water All Alternatives) and 20 (Biological Resources Vegetation – Grasslands, Shrublands, and Riparian Areas All Alternatives) may include that information, but they are not specific in identifying how wetlands acreage and function will be protected. Because wetlands provide food and water or shelter to over 80 percent of Wyoming's wildlife, that information may be important and should be included in the Final EIS.

In our comments on the Preliminary Draft RMP/EIS, EPA noted that long-term surface disturbance to riparian and wetland communities under Alternative B is 53 percent less than under the Preferred Alternative E (page 4-90 of the Preliminary DEIS/RMP). According to the document, Alternative B was carried forward for detailed analysis because it fulfilled the requirements of the Federal Land Policy and Management Act, met the purpose and need, and falls within the limits of the planning criteria (ES pages 4-5). EPA continues to request a thorough analysis of how the wetland impacts from Preferred Alternative E cannot be avoided or minimized and, for unavoidable losses, how they will be mitigated. In addition, please explain how the Preferred Alternative fulfills BLM's requirement under Executive Order 11990 to "... provide leadership and take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities."

We also requested an evaluation of the impacts of Off Highway Vehicle (OHV) use to fish and wildlife habitats and populations. EPA is concerned that the Preferred Alternative E proposes that less than one percent of the planning area be "closed" to OHV use (page 4-214). In the Final EIS please characterize what that means for wildlife-human conflicts and the resulting adverse impacts to wildlife habitat and natural resources.

EPA continues to recommend that Livestock Grazing Management Actions include a proposed schedule and estimate of total resources needed to fully protect riparian resources that are impaired by livestock grazing. A summary could be provided for both projected needs and actual implementation throughout the RMP's implementation period. The following practices could be included in that summary: riparian fencing, off-channel water resources for livestock, livestock prohibitions in areas that contribute run-off to aquatic areas, requirements for active herding in ecologically sensitive riparian habitats, actively managed grazing for frequency, duration, stocking rates, animal distribution, season and timing of forage use, and prevention of recreation impacts to those areas.

Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, EPA rates the Preferred Alternative, Alternative E, as EC-2. The EC (Environmental Concerns) rating means EPA has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require additional mitigation measures that can reduce

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the environmental impact. Category 2 (Insufficient Information) means EPA finds that the draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. EPA requests that the additional information, data, analyses, or discussion identified above be included in the Final EIS.

EPA recognizes the complexity of the proposed multiple resource management actions and the large geographic scale of this project. Furthermore, we support BLM's goal to update the RMP based on emerging issues and changing circumstances. EPA appreciates the numerous revisions made in the Draft EIS based on our comments on the preliminary draft document. We hope that throughout project implementation, BLM will seek ways to reduce adverse environmental impacts and improve the RMP's effectiveness.

We appreciate the opportunity to provide comments at this stage of the project. If you have any questions or would like to discuss our comments, please contact me (303 312-6004) or Jody Ostendorf (303 312-7814) of my staff.

Sincerely,



Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

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**U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

Environmental Impact of the Action

**LO • • Lack of Objections:** The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC • • Environmental Concerns:** The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO • • Environmental Objections:** The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU • • Environmentally Unsatisfactory:** The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

**Category 1 • • Adequate:** EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 • • Insufficient Information:** The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 • • Inadequate:** EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

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