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MAY 26 2005

Jamie E. Connell, Field Manger  
Bureau of Land Management  
Glenwood Springs Field Office  
P.O. Box 1009  
Glenwood Springs, Colorado 81602

RE: Roan Plateau Resource Management Plan  
Amendment and Environmental Impact Statement  
CEQ# 20040548

Dear Ms. Connell:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et. seq., and Section 309 of the Clean Air Act, the Region 8 office of the Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (DEIS) for the Roan Plateau Resource Management Plan Amendment.

The area under consideration in this Draft Environmental Impact Statement is located near the town of Rifle. For discussion purposes, the area can be divided into two segments: a lowland area at the base of the Roan Plateau, and an upland area consisting essentially of the "top" of the plateau. The base or lowland area is a highly developed swath of land that parallels Interstate 70 and the Colorado River. Development includes gas wells, pipelines, roads, ranches, and past oil shale research areas. The DEIS notes that much of this development at the base of the plateau conflicts with critical habitat for mule deer. The town of Rifle is also located very near the base of the plateau within this lowland area. The top of the Roan Plateau, except for some roads and fences, is not developed and contains some ecosystems that are found in few places in Colorado. In addition, the Colorado Cutthroat trout are found in some streams that are considered to be highly pure sources of breeding stock.

EPA understands that the communities near the Roan Plateau value the relatively undeveloped nature of the area on top and have voiced their wishes to continue to be able to enjoy the amenities of the area. This DEIS evaluates and weighs the need for additional sources of gas and how that could be accomplished while reserving as much of the natural character of the plateau as possible. The preferred alternative includes phasing the development by delaying the development of the top of the Roan Plateau until 80 percent of the existing leases at the base of the Plateau are constructed and in production.

The preferred alternative in the Draft EIS proposes to improve protections for resources such as water quality, vegetation and wildlife by discontinuing the policy of open motorized travel and limiting motorized travel to designated trails and roads. The preferred alternative also proposes segments of streams for protection status under the Wild and Scenic Rivers Act.

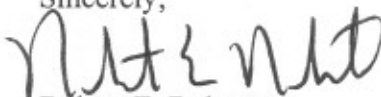
If lands on top of the plateau are leased, EPA believes that BLM's preferred alternative to delay and phase development of the plateau top given the concerns relating to the potential effects of oil and gas development on surface disturbance, water quality and sensitive wildlife species appears to be an appropriate policy choice. A phased approach to development on the top would allow the Bureau and other agencies to monitor current conditions and allow the gas industry to develop less intrusive methods of oil and gas extraction in this sensitive area. In addition, under NEPA, agencies are directed to consider reasonable alternatives both within and beyond the lead agency's jurisdiction. Thus, alternatives which include further leasing at the base of the plateau while setting aside the upper plateau for no leasing, may be within the reasonable range of alternatives to be analyzed under NEPA.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the Proposed Actions identified by the DEIS for the Roan Plateau Resource Management Plan and DEIS, has been rated EC-2. The EPA review has identified environmental impacts that could be analyzed and potentially avoided in order to fully protect the environment. The enclosed detailed comments discuss impacts resulting from improved access to the top (year round vs. seasonal), fragmentation of critical winter habitat for mule deer (base of plateau), areas with wilderness characteristics that will not be maintained, and Colorado Cutthroat impacts stemming from sedimentation caused by additional roads. We believe that such impacts may be reduced by requiring the mitigation measures identified in the analysis. I have enclosed a copy of the EPA Rating System for Draft Environmental Impact Statements for additional information.

Our review also determined that the DEIS proposals to close motorized cross country travel and to propose Wild and Scenic River designations in the area will result in significant benefits to the plateau's resources and ecosystem sustainability. We support these management actions and also applaud the Bureau's re-analysis of air quality prior to the release of this DEIS.

If you have any questions concerning the rating or the enclosed comments, please contact Larry Svoboda at (303) 312-6004.

Sincerely,



Robert E. Roberts  
Regional Administrator

Enclosures

# Roan Plateau DEIS Detailed Comments

## Air Quality Comments

1. **Visibility.** Table 4-10 shows cumulative visibility impacts and combines results of screening analyses with results of refined analyses. BLM conducted a refined analysis in cases where the screening analysis showed impacts. Section 4.2.5.7 explains that the visibility analysis showed no reduction in visibility at Class I areas due to BLM sources alone. The Technical Support Document supports this statement; however, in some Class I or sensitive Class II areas, days of cumulative visibility impact greater than 1.0 dv resulted when emissions from BLM sources were added to those of the inventory sources. In these cases, the potential impact of the BLM sources tipped the balance and caused potential cumulative impacts to exceed 1.0 dv. As shown in table 5-65 of the Technical Support Document, this occurred on one modeled day at Black Canyon of the Gunnison National Park (Class I), one day at the West Elk Wilderness (Class I), and one day at Colorado National Monument (Class II). (Additional days of reduced visibility were modeled for sources in the Vernal planning area.)

The refined analysis for the West Elk Class I area showed no days of impact exceeding 1.0 dv; however, one day with impact over 1.0 dv remained after the refined analysis for the Black Canyon Class I area. It is not possible to determine from information in the DEIS or the Technical Support Document the extent to which BLM sources contributed to this remaining day of reduced visibility. (Class II areas did not receive the refined analysis; consequently it is not possible to determine whether BLM sources would have contributed marginally to any remaining days with impact over 1.0 dv in those areas.) We recommend conducting a refined analysis at least for the Colorado National Monument.

2. **Visibility Impact at Mount Zirkel.** The last paragraph of the visibility portion of section 4.2.5.7 indicates that Black Canyon of the Gunnison National Park was the only Class I area where modeled cumulative impacts greater than 1.0 dv remained after the refined visibility analysis. However, table 4-10 shows a maximum impact of one day over 1.0 dv remaining at Mount Zirkel. EPA requests that this discrepancy be resolved in the FEIS.
3. **Ozone.** The DEIS does not address the potential of ozone impacts from the project. Table 3-9 shows background concentrations of the criteria pollutants, but does not include ozone. The model used by BLM for the air quality analysis (i.e., CALPUFF) lacks the capability to accurately represent chemical transformations and thus is not suitable for estimating ozone impacts. Running a regulatory ozone model such as RPM-IV for purposes of the DEIS is impractical, and we understand that BLM's National Science & Technology Center may be reluctant to estimate potential ozone impacts with a conservative method such as VOC/NO<sub>x</sub> point source screening tables. Nevertheless, development in the project area

includes sources of volatile organic compounds (VOC's) and oxides of nitrogen (NO<sub>x</sub>), which are ozone precursors, and the additional development proposed in the DEIS might increase these emissions significantly. In lieu of using a regulatory model, we recommend that BLM estimate potential ozone impacts using a screening table or other non-regulatory method. The FEIS should also disclose estimated VOC and NO<sub>x</sub> emissions.

4. **Class II Increment for Prevention of Significant Deterioration, PM<sub>10</sub>.** Section 5.2 of the technical support document states, "The comparisons to the PSD Class I and II increments were intended to evaluate a threshold of concern for potential impacts, and does not [*sic*] represent a regulatory PSD Increment Consumption Analysis." Furthermore, BLM compared results of the air quality analysis to the Class II increment for PM<sub>10</sub> only in sensitive Class II areas in the far field (such as the Holy Cross Wilderness Area). Section 4.2.5 of the DEIS, under PM<sub>10</sub>, discloses the modeled near-field particulate concentrations. The results indicate that the potential impact of fugitive dust from roadways and construction would meet the National Ambient Air Quality Standards (NAAQS). The BLM analysts used background concentrations of PM<sub>10</sub> of 54 µg/m<sup>3</sup> as a 24-hour average and 24 µg/m<sup>3</sup> as an annual average, which exceed the corresponding Class II increments for Prevention of Significant Deterioration of 30 µg/m<sup>3</sup> and 17 µg/m<sup>3</sup>. Consequently, adding modeled concentrations to the background concentrations also gave results over the increments. We recommend that BLM explain in the FEIS the rationale for not estimating potential in-field impacts on PM<sub>10</sub> increments.
5. **Background Concentrations – Hazardous Air Pollutants.** Table 4-8 presents background concentrations of hazardous air pollutants. It does not identify the source of the data as table 4-7 does for the criteria pollutants. EPA recommends the source of the information be identified in the FEIS.

#### **Air Quality Technical Support Document (Air Quality Assessment Report)**

6. **National Park Service Reference.** Please correct the date in the footnote to table 3-24.
7. **Increment Comparison Results, SO<sub>2</sub>.** The value for three-hour SO<sub>2</sub> under "GMA BLM Sources Only" (Glenwood Springs Management Area) in table 5-12 differs by an order of magnitude from the corresponding values in tables 5-13 through 5-16 and might be a typographical error. EPA recommends this discrepancy be resolved in the FEIS.

## Range of Alternatives

In order to fully consider all alternatives, BLM should consider an alternative that would provide leasing for oil and gas development on the base area (NOSR 3) and no leasing on the top of the plateau (NOSR 1).

### Improved access to the top (winter and year round)

Under current management of the Roan Plateau, access to the top is essentially closed during the winter months. Improved access to the top for oil and gas activities will potentially allow year-around access. Although for recreational activities, this could be considered a benefit, increased access during the winter could mean additional stress for wildlife. This change has not been analyzed and discussed in the wildlife section of the DEIS. BLM may wish to consult with USFW and/or the Colorado Fish and Game Department on this issue.

During other periods, access improvements may also encourage additional visitor and recreational interest in the Plateau. Further analysis in the FEIS should focus on what the potential increase in activity would entail. Please consider additional hunting, OHV, backpacking, mountain biking, and equestrian uses that may be increased by improved access.

### Fragmentation of critical winter habitat for mule deer (base of plateau)

The land that surrounds the base of the plateau, federal and private, is considered critical habitat for mule deer. Continued development of federal and private land will further reduce the area available for mule deer. BLM should incorporate Colorado Fish and Game mule deer management and population goals for the area.

### Areas with wilderness characteristics not protected

Although BLM asserts that it cannot designate new Wilderness Study Areas (WSA), under FLPMA Section 603, BLM acknowledges the authority to protect natural values on public lands, including the management authority to protect lands in a manner which maintains their wilderness characteristics. BLM should consider management actions such as no mineral leasing decisions or the use of NSO stipulations to preserve these values. Therefore, EPA encourages BLM to protect all lands that have been inventoried and shown to contain wilderness values. The wilderness inventories conducted by BLM in 1998, 1999 and 2000, determined that 21,382 acres met the necessary standards for wilderness characteristics. The preferred alternative proposes to protect only 9,006 acres of the qualifying 21,382 acres.

As BLM points out with the NSO stipulations for the 9,006 acres, this approach would not preclude leasing and production of the associated mineral estate. If leasing is ultimately considered for areas on the top of the plateau, BLM could determine at that time if the NSO stipulation is still necessary to protect these areas or a waiver could be

considered, if absolutely necessary, and with special conditions requiring a reduced footprint. In addition, prior to future leasing on the plateau, new drilling technologies may be developed to enable construction and production without any surface disturbance within these areas. The DEIS should at least provide an analysis that would determine how much of the fluid minerals within the 21,382 acres with wilderness characteristics could be developed with current directional drilling technologies including additional costs to develop the resource.

### Colorado River Cutthroat Impacts

#### **Sediment**

The DEIS states that closing the top of the plateau to open motorized travel per the preferred alternative will result in a benefit to aquatic life, especially to the Colorado River Cutthroat Trout. However, the preferred alternative will also allow an increase in roads and well pads to develop gas resources. The DEIS indicates that this could impact sedimentation and aquatic life. EPA suggests that BLM provide best management practices that would reduce impacts from building, using and maintaining gas industry roads.

#### **Introduction of non-native trout**

Increasing the roads under the preferred alternative will increase access to habitat and as a result could increase the potential for introductions of non-native trout. Proposals to increase the number of roads on the top of the plateau should analyze for the potential for non-native trout introductions and special management practices may be necessary to protect the remaining populations of Colorado River cutthroat trout. EPA recommends that BLM consult with USFWS and/or the Colorado Fish and Game Department on this issue.