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

September 26, 2007

Superintendent Sarah Craighead
Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85730-5601

Subject: Saguaro National Park Draft General Management Plan/Environmental Impact Statement (EIS), Pima County, Arizona [CEQ #20070322]

Dear Ms. Craighead:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

The National Park Service's (NPS) Preferred Alternative involves numerous improvements and positive operational changes to better protect Saguaro National Park's resources over the next 25 years. In addition, the Draft EIS identifies many effective mitigation measures and adaptive management strategies that could be used to protect or reduce impacts to cultural and natural resources, visitor safety and experiences, and socioeconomic environment, among others. Therefore, we have rated this Draft EIS as LO – Lack of Objections (see the enclosed "Summary of Rating Definitions").

In light of the long life of the plan and the Government Accountability Office's recent report, "Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources" (August 2007), we recommend that the General Management Plan address the potential effects of climate change on park resources and how NPS will adaptively manage affected resources. For example, climate change could influence long-term vegetation trends in the park where increases in exotic plant species produce fuel for larger and more frequent wildland fires. Increased severity and frequency of wildland fires could destroy more native plants and transform some vegetation communities into annual grasslands. These impacts could further increase the fire danger, erosion, sedimentation, and chemical and nutrient loads in surface waters, resulting in adverse impacts to water quality and quantity, valuable desert riparian areas, and species diversity. The Draft EIS briefly addresses water quantity as an issue that was dismissed from further consideration because the management alternatives would have negligible adverse impacts on water quantity in the park. An analysis of water quality appears to have been overlooked as it is neither discussed nor dismissed from further

consideration in the Draft EIS. Both these resources should be addressed in light of the cumulative, long-term effects that could result from climate change.

EPA recommends that the Final EIS include analyses of the potential impacts of climate change, over the life of the General Management Plan, on park resources such as water quality and quantity, vegetation/habitat and exotic species, wildlife, special status species, species diversity, and cultural resources. The Final EIS and General Management Plan should discuss how NPS plans to adaptively manage affected resources, including operational and monitoring needs.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3846, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/s/

Nova Blazej, Manager
Environmental Review Office

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Enclosure