UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

August 9, 2010

Randall Hayman
Boise National Forest
Vinnell Way, Suite 200
Boise, Idaho 83709

Re: EPA Region 10 Review of the Plan Scale Wildlife Conservation Strategy (WCS) Final Environmental Impact Statement (FEIS)
EPA Project Number: 09-074-AFS

Dear Mr. Hayman:

The EPA has reviewed the FEIS and ROD for the Phase 1 of the WCS: Forested Biological Community for the Boise National Forest. Our review was conducted in accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The selected alternative described in the FEIS/ROD is Alternative B with modifications added in response to comments received on the DEIS. We support the phased approach of the Forest Plan Amendments and the focus on wildlife and habitat based on the desired Historic Range of Variability (HRV) in the forest. We also support the additions to Alternative B in the ROD such as the added wildlife objective to address road-related effects; the additional wildlife resources guideline, which strives to balance the need for habitat conservation and fuel reduction in the wildland urban interface (WUI); and a strategy that focuses restoration efforts.

In our letter on the draft EIS, dated March 24, 2010, we supported the WCS management approach and the conservation principles. However, we had concerns with lack of water quality and air quality analyses and recommended additional details regarding clarity of alternatives, modeling and lack of clarity on assessment of impacts to specific indicator, ESA or sensitive species. We appreciate the responses to our comments and additional information in Section 2.5, which more sharply defined the alternatives, added information and table regarding impacts to focal species, and the expanded modeling discussion. Also, the information provided in the summary document that accompanied the FEIS was very helpful and provided a concise discussion on the purpose of the WCS and highlighted the issues and differences among alternatives.

The FEIS refers to the 2003 Forest Plan (FP) for impacts to air quality and states that Alternative B would likely meet Forest-wide objectives and are within the effects modeled in the 2003 FP. We appreciate that the modeling work has been done previously. However, the information was not available for us to reference. We believe that the EIS should demonstrate that these alternatives would have similar impacts to those analyzed in the 2003 FP by

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summarizing the pertinent information or supplying it in an appendix. We recommend that as future project specific proposals are developed, that they include information regarding air quality analyses.

Regarding water quality, the Response to Comments and Appendix 5 (Resources Not Evaluated in Detail) states that soil, water, riparian and aquatic (SWRA) resources remain unchanged as a result of this planning amendment. We anticipate that as project specific proposals are developed, SWRA resources will be evaluated and restoration activities will be designed for vegetation and SWRA. We believe that these resources are critical to "overall forest restoration, including wildlife habitat," (MPC 5.1, Alternative B). We also believe that this strategy moves a step beyond the past Forest Plan to prioritize and conduct restoration efforts (ROD, pg 13) and that it is important to consider SWRA when assessing and planning the health of the overall forest and watershed.

We recognize that Alternative B provides flexibility in the level of forest active management (e.g., conserve most forest stands that meet the definition of old-growth habitat and large tree size class). We commend the Forest Service for conducting this level of analysis based on wildlife resources and recognize that adaptive management is necessary to respond to changing conditions. We support activities that promote old growth habitat and HRV. We also support management decisions guided by concepts in this strategy and promotion of forest health that supports a vibrant wildlife community and healthy watershed conditions.

We appreciate your efforts to balance competing interests and thank you for this opportunity to comment. If you have questions concerning this review please contact Lynne McWhorter of my staff at (206) 553-0205 or by email at mcwhorter.lynne@epa.gov .

Sincerely,

Christine Reichgott, Manager
Environmental Review and Sediment Management Unit

Cc: Teresa Kubo, EPA R10, Oregon Operations Office

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