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MAR 27 2014

Ref: EPR-N

Kristin Kaiser
District Ranger
Three Rivers Ranger District
12858 US Hwy 2
Troy, MT 59935

Re: Kootenai National Forest Buckhorn Project
Draft Environmental Impact Statement
CEQ # 20140027

Dear District Ranger Kaiser:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency Region 8 has reviewed the January 31, 2014 Draft Environmental Impact Statement (EIS) by the U.S. Forest Service (USFS). It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. This includes a rating of the environmental impacts of the proposed action and the adequacy of the Draft EIS.

Project Description

The Buckhorn project analyzes timber harvest with fuels treatment, prescribed fire, and watershed improvement activities. The project area is located approximately 27 miles north of Troy, Montana, in portions of Lincoln County, Montana, and Boundary County, Idaho. The project area encompasses approximately 56,000 acres, with 19,900 acres located within two Inventoried Roadless Areas (IRAs), and includes 11,623 acres of prescribed burning over the next ten years. The project area also includes high elevation alpine areas along Buckhorn Ridge, dense, wet forested areas in Spread Creek, Meadow Creek and Hellroaring Creek drainages, 20,700 acres of unsuitable for harvest timberlands, 8,407 acres within the Wildland Urban Interface (WUI), and 333 acres of private land.

The Buckhorn project is being proposed to promote resilient vegetation conditions by managing towards characteristic landscape level vegetation patterns, structure, patch size, and fuel loading and species composition. The District proposes to accomplish this by applying timber harvest and prescribed fire techniques that promote western white pine, white bark pine and western

larch; restore fire's role on the landscape; improve vigor, extent and long-term productivity of huckleberry and other native plants to increase forage availability; provide long-term wildlife security and forage; maintain or improve water quality and native aquatic species habitat; and provide wood products to contribute to local and regional economies.

A summary of the four alternatives analyzed in the Draft EIS is as follows:

- Alternative 1 is the no action alternative.
- Alternative 2 is the Preferred Alternative and includes timber harvest and fuels treatments that create large openings, prescribed burning, watershed improvement activities (road decommissioning, and road storage service) and transportation system changes.
- Alternative 3 proposes similar activities to Alternative 2, but the timber harvest has been designed to not create openings over 40 acres in size.
- Alternative 4 is also similar to Alternative 2, but removes 582 acres of harvest that was proposed in an area that conflicted with the Forest Jobs and Recreation Act of 2013.

The EPA's Comments and Recommendations

The EPA appreciates the level of detail in the Draft EIS on potential environmental impacts and Best Management Practices (BMPs) to be implemented to mitigate many potential impacts. As a result, our comments have been narrowed to these issues: (1) aquatic resources and (2) air quality. These concerns are the basis for the EPA's EC-2 rating discussed at the conclusion of this letter.

1. Aquatic Resources

The EPA considers protection of aquatic resources to be among the most critical issues to be addressed in any NEPA analysis for vegetation management activities. Treatments contemplated under the proposed action (e.g., harvest, fuel enhancement and/or removal, prescribed burn, watershed improvement, and road management, etc.) have the potential to adversely impact aquatic resources, including wetlands, streams, riparian areas, and their supporting hydrology.

Surface Water Resources

The EPA appreciates that the Draft EIS identifies which streams have been listed on the State of Montana's Department of Environmental Quality's Clean Water Act 303(d) Impaired Waters list, as well as those that have been either removed or determined to be eligible for removal. The EPA also appreciates that the Draft EIS has identified several indicators of aquatic resource health (e.g., sediment loading, stream geomorphology condition, impacts from roads and structures found in old roads and trails, etc.). We note that additional information is referenced in *Appendix I – Literature Cited* which could be included in the body of the Final EIS to add to this discussion of baseline information. The documents that we recommend be referenced are those that most specifically assist in characterizing the current condition of surface water resources in the project area and provide information regarding how they will be maintained or improved. One example is the *Kootenai National Forest – Key Consensus – watershed condition evaluation factors (2002)*. Including information like this can help meet the need for providing baseline

information to measure future changes from the proposed action and activities throughout the watersheds of the project area. The information is also important for understanding the current condition of water quality in the project area and informs field monitoring staff when mitigation of direct, indirect and cumulative impacts needs to be implemented.

Streams, Wetlands, Springs, Seeps and Watersheds

Although the Draft EIS includes riparian habitat conservation areas to protect vegetation, streams, wetlands, springs and seeps, with 100 to 300 foot buffers, from harvesting, it does not provide specific information describing the extent to which such sensitive resources are present in the project area. The EPA recommends that the Final EIS include a qualitative discussion of the presence and existing condition of such resources. The EPA recommends including a detailed map showing their location relative to areas proposed for treatment and access due to road maintenance within the project area.

Impact of Roads on Aquatic Resources

The Draft EIS includes specific information on road construction, decommissioning and mitigation of watershed impacts from publicly accessible and non-publicly accessible roads. The EPA recommends the Final EIS and Record of Decision include, or clarify how USFS has assured a commitment to monitor road reconstruction, decommissioning, storage and new road activities to ensure that the BMPs identified in the Draft EIS are performing as intended to protect water resources.

2. Air quality Impacts

Emissions Inventory

The Draft EIS discusses several project activities that could impact air quality including vehicle emissions from logging equipment, dust from travel on unpaved roads, burning of slash piles and low intensity prescribed burns. The Draft EIS does not include information on what specific pollutants, other than PM10 and PM 2.5, would be emitted, in what quantities, and how those emissions may impact air quality and air quality related values (AQRVs). Prescribed fire activity may cause degradation of air quality and visibility in the region, especially a large prescribed area such as this. The EPA acknowledges the individual burn plans prepared for this activity would quantify expected emissions; however, the EPA recommends that the Final EIS provide a qualitative discussion of criteria pollutants anticipated to be emitted by project activities and how the emissions are predicted to impact air quality and AQRVs in the project area and surrounding communities.

We appreciate that all prescribed burning would be phased and scattered over a ten year period, carried out in coordination with several entities, including the Montana/Idaho State Airshed Group. We appreciate that prescribed burns will comply with the current Federal and State management plans including the State Implementation Plan and Smoke Management Plan. The EPA recommends the Final EIS include a commitment to directly notify the populated areas

close to pending burns through, at a minimum, notices in local newspapers. This is especially important for the residents in nearby communities and the Wildfire Urban Interface area downwind of the burn areas.

Climate Change and Greenhouse Gas Emissions

Information on current and project climate change impacts are included in the Draft EIS Vegetation Resource section. The EPA appreciates the inclusion of climate change as related to forest health and the proposed project. We would like to include this project in our ongoing inter agency discussions on how the USFS is progressing in efforts to better reduce the impacts of project activities on climate change, monitor for specific effects of climate change on forest resources, and include project specific quantified analysis and disclosure of greenhouse gas (GHG) emissions as additional GHG emission guidance from the Council on Environmental Quality is developed.

The EPA's Rating

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, we are rating this Draft EIS as Environmental Concerns-Insufficient Information. (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified a need for additional information, data, analyses or discussion in the Final EIS in order for the EPA to fully assess environmental impacts from the proposed project. A full description of the EPA's rating system may be found at: http://www.epa.gov/compliance/nepa/comments/ratings.html#adequacy.

We hope that our comments will assist you in further reducing the environmental impacts of this project. We appreciate the opportunity to review and comment on this Draft EIS. If we may provide further explanation of our comments, please contact me at 303-312-6704. You may also contact Nat Miullo, lead reviewer for this project, at 303-312-6233, or Miullo.nat@epa.gov.

Sincerely,

for David Tomczyk

Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystem Protection and Remediation

cc: Julie DalSoglio, Montana Office Director