UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

May 22, 2008

Ms. Cathy Barbouletos, Forest Supervisor
Flathead National Forest
650 Wolf Pack Way
Kalispell, Montana 59901

Re: CEQ # 20080155; EPA Comments on Cooney McKay Forest Health and Fuels Reduction Project FEIS & ROD

Dear Ms. Barbouletos:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Cooney McKay Forest Health and Fuels Reduction Project in accordance with our responsibilities under the Section 102(2)(C) of National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to agency and public comments and concerns identified during review of the DEIS, including clarification that a total of 1.25 miles of new temporary road are proposed. Thank you also for explaining that the proposed tractor harvests are on gentle terrain in areas where soils are not sensitive to disturbance. EPA is supportive of proposed activities to reduce hazardous fuels and fire risk, particularly in wildland urban interface (WUI) areas near homes and structures, and to improve the resiliency and sustainability of vegetative communities. We are pleased that the proposed project appears to be generally consistent with our preferences favoring thinning from below treatments that retain the larger more vigorous trees and desirable tree species whose overall composition is declining (e.g., western larch, whitebark pine, Ponderosa pine); restores prescribed fire to forest ecosystems; and the selected alternative, Alternative 3-Modified, has the least timber harvest and least water quality impacts of the action alternatives evaluated.

We are also pleased that the Cooney McKay project would use INFISH streamside buffers, and includes road BMP upgrades and maintenance on 19.8 miles of road, and specific Design Criteria (Appendix 2) to ensure beneficial uses of water are protected. In addition, we appreciate the identification of existing sediment sources and fish barriers to be treated as funding is available to promote water quality improvement and restoration of full support of beneficial uses for impaired waters. This is important since the EIS states that some streams

have high levels of sediment from past land management (e.g., Alder, Smith, Pony, Dog, Meadow, Simpson and Falls Creeks). We also appreciate your understanding of the need to be consistent with the Total Maximum Daily Load (TMDL) and Water Quality Plan intended to improve water quality in Swan Lake. We are concerned, however, that inadequate funding is available to implement needed watershed restoration work. Watershed rehabilitation work that is proposed which cannot be implemented on a timely basis in relation to other project activities has less value in mitigating effects. We especially support addressing roads that are chronic sources of sediment to streams, and decommissioning unneeded roads that cause resource impacts. Reductions in road density, especially road stream crossing density, has been correlated with improved aquatic health in many areas.

The EPA appreciates the opportunity to review and comment on the EIS, and to participate in the NEPA process. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,

/s/
John F. Wardell
Director
Montana Office

Enclosures
cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena
Steve Brady, District Ranger, Bigfork