**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 20, 2005

B-19J

Jeffrey G. Pullen, Forest Planner
Huron-Manistee National Forests
1755 South Mitchell Street
Cadillac, MI 49601

**RE: Draft Environmental Impact Statement for the Proposed Forest Plan for the Huron Manistee National Forests (CEQ# 20050105)**

Dear Mr. Moore:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Forest Plan for the Huron-Manistee National Forests in Michigan. The Huron-Manistee National Forests, two separate Forests administered together, total approximately one million acres of public land in Michigan's lower peninsula. The Forests support a variety of uses including recreation and timber production.

The DEIS evaluates three alternatives and identifies Alternative B, the proposed plan, as the Preferred Alternative. Highlights of the Preferred Alternative include management for recovery and continuance of two endangered species: the Kirtland's warbler and the Karner blue butterfly. Under this alternative, the Forest Service plans to restore and maintain approximately 58,000 acres of large-scale openings, including grasslands, prairies, and oak-pine barrens which support habitat restoration goals for several species. The Preferred Alternative also introduces fire management through establishment of fuel breaks as well as through prescribed burning to benefit fire-dependent species and habitats.

The U.S. EPA commends the Forest Service for its thorough treatment, in the DEIS, of an extensive array of natural resources and forest uses, all of which need to be evaluated in the context of the Forest Plan. We concur with the selection of Alternative B as the Preferred Alternative. The DEIS provides information which supports this alternative as the plan that will allow the Forest Service to make progress toward its goals for this forest, especially in habitat management for endangered species and on recreation management and enhancement.

The DEIS, however, was not complete in its evaluation of potential impacts of some activities that will or may occur under its Preferred Alternative. In addition, the document could be more transparent in disclosing environmental effects from other actions, such as the barrens restoration

projects. For these reasons, U.S. EPA rated the DEIS an Environmental Concerns- insufficient information (EC-2). This means that the U.S. EPA has identified environmental impacts that should be avoided and suggests corrective measures which may require changes to the preferred alternative or mitigation measures that can reduce impacts. The rating also means that the DEIS does not (in some areas) contain sufficient information to fully assess environmental impacts of the preferred alternative or other alternatives that are reasonably available to the project. Specific comments follow below.

**General Comments**

The DEIS provides good information that is crucial to evaluating the alternatives, such as:

- The amount of acreage that is needed to support Kirtland's warbler breeding pairs, as determined in the recovery plan, as well as the deficit in acreage the Forest Service needs to address. (III-59)
- The presence of the Indiana bat on the Forests, and the general location of its hibernacula. (III-54)
- The current occurrence of the Karner blue butterfly on the forest; also, the Forest Service's indicators for this species habitat (page III- 62)

This information is found within discussions of direct, indirect, or cumulative impacts of specific alternatives. We recommend that the DEIS authors consider presenting this basic information in summary form at the beginning of the Threatened and Endangered Species section or at the beginning of the species-specific sections to make the information more accessible to the public and to allow clearer evaluation of alternatives against this information.

**Soil Impacts:**

Section III-16 describes direct impacts to soils that could lead to increased erosion, which could potentially affect water quality. We suggest the Final EIS (FEIS) describe mitigation to prevent or reduce erosion and increased runoff in machine-planted areas, thereby preventing or reducing water quality impacts. For example, the best management practices described in the water quality section could be incorporated into planting activities to prevent erosion as well.

**Water Resources Impacts**

We recommend the FEIS discuss potential impacts to water quality and quantity that may occur as a result of the Forest Plan's allowing mineral exploration and mining. (As an example, the air impacts section discusses potential impacts to air quality from mining activities on forest lands.)

The DEIS does not include a discussion of the cumulative impacts to water quantity of Alternatives B (the preferred alternative) and C.

Because mining activities and clearing activities have the potential to affect water quality and flow, we encourage the Forest Service to consider proximity to water bodies when selecting locations for specific projects. In addition, we note that the project-specific environmental impact documents for these activities will need to fully address impacts to water.

The DEIS does not identify impaired waters or proposed total maximum daily load (TMDL) allocations for waters within the proclamation boundary. It does note on page III-5 that water quality is generally good, though exceptions exist where there are concerns with polychlorinated

biphenyls, nutrients, and mercury. The FEIS should note that there are no listed impaired waters or TMDL allocations. In addition, we suggest the FEIS include a discussion of how the Forest Plan will impact or avoid impacting waterbodies that have these concerns.

**Creation of Clearings/ Barrens Restoration**

The restoration and maintenance of large-scale openings (500+ acres each) are new features in the Huron-Manistee's Forest Plan, according to the DEIS and per discussions with Forest Service representatives. In particular, the openings are part of restoring habitat, including prairies, barrens, and savannahs, for many species, some of which are endangered. The Forest Service will also carry out some clearing activities to create fuel breaks. Information about the clearings and their potential benefits and impacts is spread throughout the document and appears also to be incomplete. We recommend consolidating this information in a separate section of the FEIS, and adding additional information where indicated. We also suggest it may be useful to handle the clearings/restoration activities as a separate section in the Forest Plan to help the public understand the approach, its intended purpose, and its impacts. Whether or not the Forest Service opts to create a separate discussion of clearings and barren restorations, the FEIS should discuss the following:

- General locations where clearings might be created, as possible.
- Whether clearings coincide with other management activities, and whether the activities have a cumulative effect in their local area.
- Whether any barrens restoration areas may also be fuel breaks, or whether these projects will happen at separate locations.
- Potential impacts to water quality from creating and maintaining clearings.
- Plans to counteract potential impacts from creating clearings, for restoration or fuel breaks, such as increased non-native species, such as spotted knapweed (this potential impact is included in the discussion of the Karner blue butterfly)
- Soil disturbance impacts from creating clearings (this is not discussed under the soil section).
- How the clearing will be accomplished (e.g. a one-time harvest of a single clearing of 500+ acres or a progressive clearing of a designated area over a series of years).
- A discussion of restoration activities, such as planting.

**Invasive and Non-Native Species**

The DEIS notes repeatedly that the creation of clearings to restore barrens will provide a greater opportunity for invasive species to impact the forest. The DEIS also states that new mitigation standards for Alternatives B and C will apply to the entire range of management practices. We recommend the FEIS include a specific discussion of prevention measures the Forest Service will use under the plan to address potential invasive spread in the clearing/restored barrens areas, since these areas would be especially prone to invasive encroachment. If the mitigation does not apply in these areas, we strongly recommend them as special emphasis areas for invasive species control.

In other forests in the region, the brown-headed cowbird has been a concern along forest edges, as an impact to other bird species. The DEIS does not mention whether parasitism by this bird is a concern and could be increased by creating barrens on the forest. If this is a concern, please

include it in the FEIS; if not, it may be useful to provide some supporting documentation before dismissing the issue.

**Kirtland Warbler**
On page III-59, the DEIS states a recovery objective of a minimum of 1,000 pairs; however, later on the page it states that the Forests' goal is a minimum of 420 pairs. The FEIS should explain these contradictory statements, and make clear what the goal is and the timeframe.

**Effects on Trails -Nonmotorized**
We recommend specifying the amount of increased mountain bike trails under Alternatives B and C for direct comparison with Alternative A's 130 miles of trail access (see page III-285).

**Motorized Recreation**
The Preferred Alternative (the draft Forest Plan) will open 3,626 miles of trails and roads to snowmobiles, an increase over the current 600 miles of trail for this use. The DEIS did not evaluate the impacts to the Forests of this management choice. The FEIS should include an evaluation of the potential impacts to wildlife from increased snowmobile use. In addition, the barrens restoration areas may be attractive to recreational users; we recommend evaluating potential impacts to barren restoration areas from motorized uses. We realize that project-specific documents are likely to address this, but we suggest that it merits at least a general discussion about potential impacts and the Forest Service's general plans on this topic. The Forest Service may want to take motorized recreational areas into account when planning the location of barrens restoration projects.

Thank you for the opportunity to review the Forest plan and DEIS. If you have any questions, please contact Anna Miller of my staff at (312) 886-7060 or miller.anna@epa.gov.

Sincerely,

*/s/ K. Westlake 6/20/05*

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems, and Communities

cc: Randy Moore, Regional Forester