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

May 14, 2013

Ms. Michelle Davalos
Forest Planner
Apache-Sitgreaves National Forests
P.O. Box 640
30 South Chiricahua Drive
Springerville, Arizona 85938

Subject: Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan, Apache, Coconino, Greenlee, and Navajo Counties, Arizona (CEQ# 20130028)

Dear Ms. Davalos:

The U.S. Environmental Protection Agency has reviewed the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA commends the Forest Service for the commitment to ecological restoration and adaptive management demonstrated in the proposed Apache-Sitgreaves National Forests Land Management Plan (Plan) revision. The revised Plan includes important new information and land management strategies on topics, such as invasive species and climate change, that have become central management challenges since the Plan was first implemented. We strongly support the ongoing collaboration between the Kaibab, Coconino, and Apache-Sitgreaves National Forests to sustainably manage Arizona's federal ponderosa pine and mixed conifer forests, both through revisions of your respective land management plans, as well as through the Four Forest Restoration Initiative (4FRI), which is also undergoing NEPA review. We will submit comments on the 4FRI DEIS later this month.

Based on our review of the subject DEIS, we have rated the Preferred Alternative and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA recognizes the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. We commend the Forest Service for committing, in the Preferred Alternative, to strong best management practices and soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments. We would also like to acknowledge the thorough description, in the DEIS, of the possible effects of climate change on the Apache-Sitgreaves National Forests, and for including Appendix A: "Climate Change Trends and Apache-Sitgreaves NFs Land Management Planning" in the Plan. Appendix A, with its comprehensive analysis of climate change trends, possible effects, and management strategies to avoid or mitigate these effects, is an excellent supplement to the DEIS and one of the finest treatments of climate change that my office has seen in a NEPA document. We recommend that the Final EIS and Record of Decision include a commitment to implement these mitigation strategies.

We recognize the challenge the Forest Service faces by implementing a management plan that will rely heavily on prescribed burns and wildfire to achieve restoration objectives. We commend the Forest Service for preparing an "Air Quality Specialist Report" for this Plan that explains these challenges. Though the planning area has good air quality, and meets all federal ambient air quality standards, the fine particulate matter generated during wildland fire does present a human health risk. We recommend that the Forest Service implement BMPs and work with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent. We also recommend that the Forest Service analyze and include a description, in the FEIS, of the potential for further reductions in air emissions, in future forest treatments, by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the Final EIS is released, please send one CD copy to this office. If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of the EPA Rating System