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

March 24, 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) Draft Environmental Impact Statement (DEIS)
EPA Project Number: 09-074-AFS

Dear Mr. Hayman:

The U.S. Environmental Protection Agency (EPA) has reviewed DEIS for the Forest Plan Amendments Proposed to Facilitate Implementation of the 2009 Plan-Scale WCS, Phase 1 Forested Biological Community for the Boise National Forest (NF). Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS analyzes the No Action Alternative (Alternative A) and two action alternatives, Alternative B (Forest Service proposed alternative) and Alternative C related to Phase 1- Forested Biological Community of the Forest Plan amendments. Alternatives B and C are similar in most regards and both involve reallocating 400,000 acres to different management prescription categories. Alternative B includes an exemption that allows activities related to wildland urban interface (WUI) hazardous fuels reduction treatments on wildlife habitat. EPA supports the four phased approach for amending the Forest Plan and modifying Forest Plan standards based on biological communities.

The EIS states that most terrestrial wildlife species of concern are associated with the forested habitats in the non-lethal and mixed 1 fire regimes (approximately 50% of project area). Based on the updated assessment, these areas have reduced old growth forest and large tree size class stands, reduced habitat quality and increased risk of uncharacteristic wildfire or insect events. Alternatives B and C include changes to the Forest Plan standards that emphasize a desired condition representing historic range of variability (HRV) habitat, which is associated with the viability of wildlife populations. These activities include: retaining old growth forest and large diameter tree class stands; an inclusive wildlife conservation strategy; moving 400,000 acres into management prescription category to emphasize restoration of HRV; including a standard that requires snags to be retained in the high range of desired conditions; prioritizing key habitat areas for specific wildlife species; and including a guideline that restricts road construction activities to statutory rights and maintenance objectives.

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EPA supports the above activities along with the six conservation principles developed to guide the WCS. While we agree with these concepts and believe the alternatives may promote HRV and support terrestrial wildlife populations, the document is difficult to follow and therefore, we are unclear if there are additional measures that should be considered. Also, we have concerns that parameters such as water quality and air quality are not analyzed in this phase. Based on our review we have rated the DEIS EC-2 (Environmental Concerns – Insufficient Information). Our comments explaining our concerns and recommendations for improving clarity in the final EIS are below.

General Comments

Overall the document is not very clear. The document uses an excessive amount of acronyms and many of them are not explained. We understand this phase is tiered to the Forest Plan; however, the components of the alternatives weigh heavily on changes to forest goals, objectives and guidelines without any summary or explanation of what they are. For example the document states, "Modify for clarity Forest-wide goals TEGO01, TEGO02, TEGO03..." and "Modify objectives WIOB01, WIOB02...and standard WIST03" (pg 30-31). A large portion of the description of alternatives reads this way. We recommend that a summary of the Forest Plan goals, objectives, and guidelines be included in the EIS or as an appendix.

It is difficult to understand what the differences are between Alternatives B and C. From reviewing the document, it appears that the only differences are as follows: (1) Under Alternative B, 400,000 acres will be moved from MPC 5.2 to MPC 5.1 (restoration and maintenance emphasis with forested landscapes) and that same 400,000 acres would be moved from MPC 5.2 to MPC 3.2 (active restoration and maintenance of aquatic, terrestrial, and wildlife resources) under Alternative C, and (2) Alternative B includes an exemption that allows activities related to wildland urban interface (WUI) hazardous fuels reduction treatments on wildlife habitat while Alternative C does not. We note that the EIS states (pgs. 46 and 49) that there is a relatively small difference between the alternatives based on assumptions that the WUI exemption is not expected to result in substantially different results of large tree size trends. We are unclear if the differences mentioned above are the only modifications, what the difference in impacts would be between MPCs 5.1 and 3.2, and what activities would occur under Alternative B related to WUI. We recommend that the final EIS provide additional information regarding activities under the alternatives and sharply identify the differences between alternatives.

It is also difficult to understand the management strategies under the two action alternatives. For example, it is unclear how much mechanical treatment would be pursued, the extent to which wildland fire would be used, and the extent to which prescribed fire would be utilized. To understand acreages, the reader must go to Table 24 in Appendix 4 and that table must be used in conjunction with Table 18 on page 18 of Appendix 4 in order to make sense of it. The document consistently refers to Appendices for information and maps that we believe could be incorporated within the body of the document so that the reader can follow the progression more easily. We recommend that more detailed maps of alternatives, description of acreages, and location of prescribed fire be incorporated into the relevant section of the EIS.

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The EIS includes a list of resources not evaluated and includes items such as air quality and smoke management, water resources, and nonnative plants. We understand that this phase focuses on a comprehensive WCS; however, the EIS should provide some discussion of how these resources would be affected related to alternatives. We believe that many of these resources also are necessary to support habitat and therefore, species viability. We recommend that, as other phases of the Forest Plan amendments are developed, they build upon each other and include a summary of previous phases analyzed and their relationship. We believe this approach is important since these resources are not mutually exclusive.

Modeling/Impact Analysis on Wildlife

The DEIS includes a section on methods and states that 18 focal species were selected for the analysis in the Forest Plan Amendment. A key component of the impact analysis appears to be based on five qualitative "sustainability outcomes" that were developed from the six conservation principles discussed in the EIS. These range from Outcome A—suitable environments are broadly distributed or of high abundance to Outcome E—uncharacteristically isolated habitats and we support activities that promote Outcomes A for wildlife species. The EIS also includes a short discussion on data collection such as landscape conditions over time through Landsat data and states that risk factors negatively affecting focal species were identified for modeling. We support the use of matrices to conduct qualitative analyses of alternatives and conditions affecting wildlife resources and modeling efforts to inform management decisions. However, there is a lack of information regarding the modeling used except for a reference to a separate report. It is also not clear how the modeling informed the sustainable outcomes matrix. Furthermore, it was difficult to extract information to determine which species fell under which "Outcome." We recommend that the methods section be revised to include list of models used along with a summary of how they were incorporated in the matrix. We also recommend that the EIS provide a table or some format that clearly compares the various outcomes for focal species with each alternative.

Air Quality

The EIS does not analyze impacts to air quality. The rationale for this is provided in Appendix 5 (Resources not evaluated in detail). On page 2, Appendix F it states that there would be no measurable change in the effects to air quality and smoke management from those that were analyzed in the 2003 Forest Plan EIS. This is because "the proposed amendment would not result in a measurable increase in the number of acres treated using fire for the remainder of the planning period." According to table 24 (Appendix 4) there would be a total of 118,410 acres treated annually with fire (wildland and prescribed fire). This is an increase of nearly 27,000 acres over Alternative A (current condition). The EIS should demonstrate why this would not constitute a "measurable increase in the number of acres treated using fire."

Water Quality

The DEIS also does not analyze impacts to water quality. The DEIS states that "changes in MPC allocation and management direction proposed under this amendment process would not result in any measurable change in effects to soil/water/riparian/aquatics (SWRA) resources from those described in the 2003 FEIS" (page 2, Appendix 5). According to Table 24 of Appendix 4, however, it appears that under Alternative B, there would be a shift away from shelterwood removal with overstory (SWOR) and reserve tree clearcut (RTCC) to commercial thinning (CT)

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and commercial thinning from below (CTFB). We favor the transition toward HRV for the large tree size class and recognize that more extensive CT and CTFB may require a more extensive road network. The EIS should give additional consideration to road-related impacts to SWRA associated with the proposed shift in management strategy.

We also note that wildland fire would play a more prominent role as a management tool under Alternative B. We support allowing fire to return to fire-adapted ecosystems, but we note that wildland fire can burn more intensely than prescribed fire, resulting in soil instability and erosion. If wildland fire is used for management, additional consideration should be given in the EIS as to how that fire would be managed within watersheds where sedimentation is a water quality parameter of concern.

Thank you for the opportunity to review this DEIS. If you would like to discuss these issues, please contact Lynne McWhorter of my staff at (206) 553-0205 or via email at mcwhorter.lynne@epa.gov.

Sincerely,

for

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

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