



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Richard N. Rine
Assistant Director for Planning and Ecosystem Management
USDA Forest Service
201 14th Street, S.W.
Washington, DC 22050

Dear Mr. Rine:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (EIS) for the Forest Service's Revised Land Management Planning Rule (Rule) (36 CFR 219) for National Forest System (NFS) lands. Our review is pursuant to Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality's NEPA implementing regulations (40 CFR Parts 1500-1508).

We would like to acknowledge the Forest Service's extraordinary and successful efforts to develop this revised Rule. The preferred alternative (Modified Alternative A) stresses a collaborative process that will involve the public and other stakeholders, and we are confident it will provide a framework to guide the science-based development, amendment and revision of land management plans in a manner that will promote healthy, resilient, diverse and productive national forests and grasslands with a range of social, economic and ecological benefits.

We are particularly interested in the requirement to maintain and restore watersheds, water resources, water quality, and the ecological integrity of riparian areas. NFS lands are the source of 20% of the nation's supply of drinking water, and 50% of the supply of drinking water in the Western U. S. Information generated from broad scale assessments, a key objective of the Rule, will assist in prioritizing and protecting these resources.

We appreciate that the preferred alternative identifies the importance of protecting sole source aquifers and source water protection areas and that the revised rule will include the restoration of watersheds as a core management objective. In addition, we are pleased that the Final EIS's response to comments (Appendix O) states that the Forest Service intends to use the Watershed Condition Framework (WCF) for identifying priority watersheds, developing watershed action plans and implementing projects to maintain or restore conditions in priority watersheds. While we recognize that the Rule will not codify the criteria for selecting watersheds where the WCF will be used, we look forward to working with you on developing

those criteria. We also recommend that additional protections for key watersheds, including areas with either existing or potential high quality habitat, as well as conservation areas, be considered. These additional protections may include the development of specific standards and guidelines that would focus on maintaining and restoring habitat value and healthy watershed function.

We also appreciate that the preferred alternative outlines direction for maintaining, protecting and restoring riparian areas and including a minimum 100-foot riparian zone. The success of this approach will require adequate monitoring to direct adaptive management actions given that site-specific conditions vary greatly and measures needed to maintain, protect and restore will vary in intensity and over time.

Finally, we note that while the preferred alternative does not specifically provide additional measures to address the impacts of roads on NFS lands, the Final EIS recognizes that forest roads can adversely affect water quality and aquatic biota by increasing soil erosion and sedimentation yield to waters. While the Final EIS recognizes that there are other Forest Service policies and procedures that address impacts from roads, the Final EIS also notes that considering reductions in road density will be emphasized as part of the Rule's implementation. We appreciate these efforts, and also continue to support the Forest Service's National Guidance¹ for implementing Subpart A of the Travel Management Rule as an effective strategy for identifying and maintaining an appropriately sized and environmentally sustainable road system, including identifying roads that may be need to be decommissioned.

EPA appreciates the opportunity to review the Final EIS and Planning Rule. If you have questions or need further explanation of our comments please contact me at (202) 564-5400, or have your staff contact Elaine Suriano at (202) 564-7162.

Sincerely,



Susan E. Bromm
Director
Office of Federal Activities

¹ Letter from Deputy Chief, National Forest System to Regional Foresters, Station Directors, Area Director, IITF Director, Deputy Chiefs and WO Directors, November 10, 2010, "Travel Management, Implementation of 36 CFR, Part 212, Subpart A (36 CFR 212.5(b))."