



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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JUL 25 2016

Ref: 8EPR-N

Chris Savage, Forest Supervisor
Kootenai National Forest
c/o Brian Donner
District Ranger, Eureka Ranger Station
949 Highway 93 N.
Eureka, Montana 59917

comments-northern-kootenai-fortine@fs.fed.us

Re: Draft Environmental Impact Statement, Galton Vegetation Management Project
Vegetation Project, CEQ # 20160112

Dear Messrs. Savage and Donner:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the Galton Vegetation Management Project. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

Project Background

The project area is located in the Kootenai National Forest east of US Highway 93 from the US/Canadian border to south of Dickey Lake and includes the Ten Lakes Wilderness Study Area, Ten Lakes Scenic Area, Grave Creek, Therriault Lakes, Mount Marston and Ant Flat.

The Draft EIS analyzed two action alternatives and the no action alternative. Both action alternatives include commercial harvestings and prescribed burning to reduce fuels and improve forest conditions. The most pronounced difference between the two alternatives is Alternative 1 includes a larger area of ecosystem burning in the Wilderness Study and Inventoried Roadless areas.

Comments and Recommendations

We appreciate the detailed Draft EIS alternative descriptions and mitigation measures. For example, the best management practices (BMP) for soil and water conservation in Appendix 2 provide good detail on applicable BMPs and how the BMP will be implemented. We recommend compiling a list of applicable air quality mitigation measures, unless already developed as part of the Idaho/Montana Airshed Group, to further reduce air emissions. Potential air mitigation measures include:

- Measures to improve slash pile combustion efficiencies to reduce smoke and/or promote the use of the slash (e.g. mulch);

- Limit idling of heavy diesel equipment and transportation vehicles;
- Require heavy diesel equipment to use cleanest available engines or retrofits with diesel particulate control technology;
- Maintain engines;
- Use low-sulfur or alternative fuels;
- Expand application area for dust abatement measures; and
- Implement detailed dust control plans particularly where dust is expected near occupied dwellings.

Closing

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed project, the EPA is rating the Draft EIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, or discussion that we recommend for inclusion in the Final EIS. A description of the EPA's rating system can be found at: <http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>.

We appreciate the opportunity to participate in the review of this project. If we may provide further explanation of our comments, please contact me at 303-312-6704, or your staff may contact Dana Allen, at 303-312-6870 or allen.dana@epa.gov.

Sincerely,



Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation