



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

AUG 05 2016

Ref: 8EPR-N

William Avey, Forest Supervisor
Helena – Lewis and Clark National Forest
c/o Heather DeGeest, Helena District Ranger
Attn: Telegraph Vegetation Project
2880 Skyway Drive
Helena, Montana 59602

RE: Telegraph Vegetation Project Final Environmental Impact Statement, CEQ# 20160162

Dear Supervisor Avey:

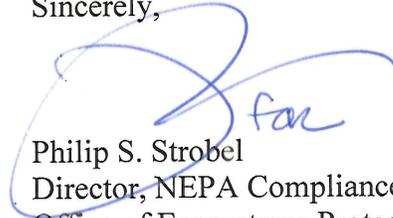
Pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the U.S. Department of Agriculture Forest Service's July 2016 Final Environmental Impact Statement (EIS) for the Telegraph Vegetation Project. This Final EIS was prepared by the Helena National Forest, Helena Ranger District, in response to the mountain pine beetle outbreak. The Final EIS analyzes the environmental impacts associated with activities intended to improve conditions for fire suppression, recover economic value of dead and dying trees, and maintain and improve watershed values.

The EPA provided comments on the Draft EIS in an August 12, 2015 letter. The Draft EIS analyzed three alternatives, but no Preferred Alternative was identified. Both action alternatives included proposals, in varying amounts, for vegetation treatments, including thinning, harvest and prescribed fire, and temporary road construction to facilitate treatments, as well as road-stream crossing improvements. The EPA's primary concerns with the Draft EIS were related to (1) project design features, mitigation and monitoring and (2) water resources.

The Final EIS includes an updated Hydrology Specialist Report that more clearly discloses existing water resource conditions and potential project impacts. In addition, the Final EIS includes a new Alternative 4 (Preferred Alternative), developed in response to comments received during the public comment period on the Draft EIS. This alternative includes significantly more road-stream crossing improvements as compared to the Draft EIS alternatives. Further, project design features have been expanded to an extensive list that includes protection of water resources; notably, implementation of the Inland Native Fish Strategy (INFISH) standards for all actions in all treatment units. It appears that measures such as no-ignition and no-mechanical-treatment buffers for wetlands, riparian areas and streams will reduce sediment delivery to impaired streams and protect water resources in the project area.

We appreciated the opportunity to review this Final EIS. If we may provide further explanation of our comments, please contact me at 303-312-6704, or your staff may contact Amy Platt at 303-312-6449 or platt.amy@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Strobel", is written over the printed name and title.

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

