



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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DEC 14 2016

Ref: 8EPR-N

Mary Erickson, Forest Supervisor  
Custer Gallatin National Forest  
Attn: Forest Plan Revision  
10 E. Babcock, P.O. Box 130  
Bozeman, MT 59771

RE: Draft Assessment Report for Forest Plan Revision

Dear Supervisor Erickson:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service (USFS) November 2016 Draft Assessment Report of Ecological, Social and Economic Conditions on the Custer Gallatin National Forest (Assessment Report). This document provides available information regarding the baseline conditions of the Forest and is the first step in the Forest Plan revision process currently underway. Through this process, if a determination is made that there is a need to revise the existing Gallatin and Custer Forest Plans, then the Assessment Report will inform the Affected Environment section of the associated Environmental Impact Statement (EIS) that the USFS would need to prepare under the National Environmental Policy Act (NEPA). For this reason, we appreciate the opportunity to provide early recommendations related to disclosure of baseline conditions on the Forest. Please note that we would likely provide scoping recommendations, in accordance with our responsibilities under Section 102(2)(C) of the NEPA and Section 309 of the Clean Air Act (CAA), should the USFS issue a Notice of Intent to prepare an EIS for a Forest Plan revision at a later date in its process.

The Draft Assessment Report covers a broad spectrum of existing resource conditions in the Forest. Based on the available information, we have focused our initial recommendations for characterization of baseline conditions on the following: (1) water resources and (2) air quality.

**(1) Water Resources**

We note that some of the existing conditions information is either outdated or unavailable, as noted in the specialist reports. For example, the *Draft Aquatic and Riparian Ecosystem Report*, notes that "current condition analyses typically depict data generally collected within the last 10 to 15 years." In addition, the *Draft Soils Report* notes that some soil surveys in the planning area are either outdated or not completed. Given that a new Forest Plan would be in effect for approximately 15 years from the date of its adoption, an accurate representation of existing conditions will be prerequisite to the ability to

assess future impacts. If a Forest Plan revision and associated EIS are deemed necessary through the ongoing assessment process, then we recommend the USFS update the existing conditions information, including the maps, to the extent possible and provide an explanation for any older data considered representative of current conditions.

The Draft Assessment Report provides qualitative and some quantitative discussion of baseline conditions. We recommend providing more detail and/or maps for the following issues (see the sections below for additional detail):

- Maps of planning area waters, including streams, tributaries, lakes, springs and wetlands. It would be helpful to expand the specialist report summary to specifically name the high resource value waterbodies associated with beneficial uses (e.g., agriculture, fisheries, drinking water, recreation);
- Surface water information, including available water quality data in relation to current standards and sediment loads;
- Available groundwater information, including quality and location of aquifers; and
- Using the most recent EPA-approved lists, a map of water body segments classified by the Montana Department of Environmental Quality (MDEQ) or the South Dakota Department of Environment and Natural Resources (SDDENR) as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by each respective state; and water bodies that have not yet been assessed by the states for impairment status. We also recommend that a table be provided to identify the designated uses of water bodies and the specific pollutants of concern, where applicable. The MDEQ and SDDENR can identify/validate any CWA Section 303(d) listed waterbodies in the planning area. The most recent EPA-approved 303(d) lists for Montana and South Dakota are dated 2014 and 2016, respectively.

Water Quality Data: Water quality data for the streams and lakes in the planning area provide important information to guide management of the Forest, as well as a baseline for future monitoring and evaluation of potential influence on downstream water quality. We recommend the Assessment Report provide a summary of available information and monitoring data on water quality for the planning area, including parameters such as total nitrogen, total phosphorus, total suspended solids, temperature and those of interest for impaired waterbodies downstream of the project area. Identification of any significant gaps in data may be helpful in developing future monitoring plans.

Erosion and Sediment Load Analysis: Erodible soils may represent a source of pollutants in the planning area. Increased sediment from surface disturbance may degrade water quality in receiving streams and may represent a significant source of pollutants when mobilized by natural and human-caused soil disturbances. Depending on a host of variables including soil characteristics, industrial operations, condition of roads/trails, and topography, associated runoff could introduce sediments as well as salts, selenium, heavy metals, nutrients and other pollutants into surface waters.

We recommend providing a map of fragile soils, such as those with elevated levels of salinity or selenium and/or those prone to erosion, in the planning area. Because sediment loading is already a

concern and future USFS-authorized activities would result in new surface disturbance that may enable erosion, it is important to provide baseline information about this issue. Therefore, we recommend including a qualitative assessment of erosion rates in the planning area. If this qualitative assessment indicates the potential for significant impacts to water quality, then we recommend the Forest Plan revision and associated EIS provide a quantitative estimate of erosion rates. For example, erosion rates can be calculated using the Water Erosion Prediction Project model (WEPP), a web-based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at <http://www.ars.usda.gov/Research/docs.htm?docid=18084&pf=1>. We recommend that the USFS consider using this model or another appropriate model that would be applicable to this planning area.

Groundwater: Groundwater is an important resource in the planning area since it provides domestic and public water supply. Groundwater quality is also important because groundwater may discharge to lakes and streams or be recharged by these waterbodies. Shallow aquifers are more susceptible to contamination because a contaminant introduced at the surface may more rapidly enter the system, and there is less intervening soil to adsorb the contaminants before they reach the groundwater.

The Draft Assessment Report notes that information regarding baseline groundwater conditions is lacking. We recommend addressing assessment needs to identify and briefly describe the shallow aquifers, including alluvial aquifers along streams and rivers, in the planning area. We recommend including available groundwater quality information, and identifying which shallow aquifers are sources for public water systems, domestic wells or stock wells. This information can be obtained from the SDDENR and the Montana Department of Natural Resources and Conservation. For assistance with groundwater data, please contact Millie Heffner with the Montana Bureau of Mines and Geology, at 406-444-0581, and Tom Brandner with the SDDENR Ground Water Quality Program, at 605-773-3296.

Public Drinking Water Supply Sources: The Draft Assessment Report includes a qualitative discussion of municipal water supply in the planning area. States have conducted source water assessments for groundwater and surface water sources of public drinking water supplies. The EPA recommends that the Assessment Report include a map, appropriate for public dissemination, showing the generalized locations of all source water assessment and protection areas associated with public drinking water supplies. Maps may be available from MDEQ, SDDENR, or the EPA upon request. Please note that more specific maps, available from the respective states, should be utilized by the USFS when locating future project activities. Please contact Eric Sivers, with the MDEQ Source Water Protection Program, at 406-444-4806 and Tom Brandner, with the SDDENR Ground Water Quality Program, at 605-773-3296 for more information.

Fen Wetlands: Fen wetlands provide important hydrological and water quality functions by improving water quality in headwater streams, and may support rare assemblages of aquatic invertebrates. They also provide critical ecological functions such as providing base flows to streams during late summer and/or drought periods. The EPA recognizes fen-type wetlands as ecologically critical in that they provide local and regional biodiversity. The U.S. Fish and Wildlife Service (USFWS) designated fen wetlands a Resource Category 1 with respect to the USFWS Peatland Mitigation Policy. The mitigation goal of USFWS Resource Category 1 is no loss of habitat values and the Peatland Mitigation Policy places the protection and avoidance of fen wetlands as a priority during CWA Section 404 reviews.

Further underlining the uniqueness and importance of fen wetlands in Montana, the U.S Army Corps of Engineers revoked the use of the majority of Nationwide Permits in peatlands/fen-type wetlands to protect this unique wetland type. In the EPA's view, these wetland ecosystems are, for all practical purposes, non-renewable and irreplaceable.

Based on information provided in the specialist report *Draft Nonforested Terrestrial Ecosystems Report*, it appears that there are fen wetlands in the planning area, which may indicate the presence of high-functioning wetlands. As you are aware, fen communities are very sensitive to hydrologic alterations and restoration is extremely challenging once function has been impaired. Due to the slow rate of accumulation of peat in fens, these ecosystems are generally considered to be irreplaceable. We recommend that the Assessment Report include a description, acreage, and map of fens within the planning area.

Roads and Trails: We recommend that the Assessment Report include a map identifying the existing forest road/trail network juxtaposed with planning area waters. It would be helpful to note current and foreseeable construction, reconstruction, maintenance, storage, decommissioning, and watershed improvement activities, where such activities are positively or negatively affecting known road/trail impacts to water resources.

## **(2) Air Quality**

The specialist report *Draft Air Resources Report* provides a summary of existing air quality conditions in the planning area. We recommend updating the Emission Inventories section to use the most current National Emission Inventory (NEI) data, which is 2014. Since this data is updated on a three-year cycle, the 2011 data presented in the specialist report may be two cycles out-of-date by the time a Forest Plan revision and associated EIS are drafted. Please note that the location of the NEI database has moved and now can be accessed at <http://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data>.

If you have not already done so, it may be helpful to contact the Bureau of Land Management (BLM) Montana/Dakotas Office for information related to its current *Montana/Dakotas Photochemical Grid Model Air Quality Modeling Study*. There may be available information relevant to the USFS planning area given that the BLM's large study includes Montana and western South Dakota. The BLM Air Resource Specialist, Melissa Hovey, can be reached at 406-896-5029.

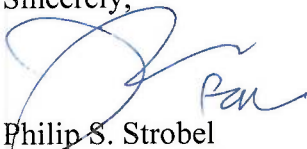
In addition, we note that the discussion related to State Implementation Plans includes a reference to the Montana plan. We recommend providing a similar reference for the South Dakota plan.

## **Closing**

We appreciate your consideration of our comments at this early stage of the Forest Plan revision process. Our comments are intended to help ensure a thorough assessment of the Forest's existing conditions with the expectation that this assessment will inform the Affected Environment chapter of an EIS should the determination be made that there is a need to change the existing Gallatin and Custer

Forest Plans. If further explanation of our comments is desired, please contact me at 303-312-6704, or your staff may contact Amy Platt at 303-312-6449 or [platt.amy@epa.gov](mailto:platt.amy@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Strobel", with a stylized flourish.

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