



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

DEC 29 2016

El Yunque National Forest
Attn: El Yunque National Forest Plan Revision
Sharon Wallace
HC01, Box 13490
Rio Grande, PR

Dear Ms. Wallace:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS)(CEQ#20160215) prepared for the Revised Land and Resource Management Plan for El Yunque National Forest, Puerto Rico.

This DEIS, prepared by the U.S. Forest Service, describes and analyzes in detail the three alternatives for managing the land and resources of El Yunque National Forest. It describes the affected environment and discloses environmental effects of the alternatives.

Alternative 2 is the proposed action for the draft revised Forest Plan. It addresses public desire to access the forest for recreation, but recognizes carrying capacities and the need to maintain sufficient infrastructure to support visitation. It shifts recreational opportunities to the lower elevations of the Forest, which are better suited for recreational use. Alternative 2 would:

- Propose a new planning system based on ecological, social, and economic sustainability.
- Recognize the need to protect and restore the functional wetlands that occur over 600 meters in elevation and increase forest vegetation types from 4 to 15 to reflect the new vegetation classification system and the Forest's most recent findings.
- Promote recreation sustainability, and address increased demands and needs by promoting recreation at lower elevations in a setting closer to local communities.
- Introduce plan components for environmental education, collaboration, and ecosystem services.
- Establish nine management areas including a new scenic byway corridor for PR 186.
- Establish three geographic areas (El Norte, El Este, and El Oeste and Sur) to increase community interactions and an "all-lands" approach to planning.
- Establish a community interface resource management area (CIRMA).
- Create an expanded management area for the purpose of research and long-term watershed studies.
- Remove direction for managing species as management indicator species and replace it with species of conservation concern.
- Provide additional management direction for priority watersheds using the national watershed condition framework.

All native ecosystems and native species, including at-risk species, would be protected. The Forest would continue to provide open space and natural settings, as well as an array of goods and services that are important to nearby residents and various communities of interest. Under the draft revised plan direction, recreation activities would be dispersed to lower elevations of the Forest, alleviating some of the existing pressure of intense use along PR 191, and ultimately allowing for more sustainable levels of recreation throughout the Forest and satisfying a broader range of recreation values and interests.

The DEIS should include a more detailed description of how the scenic byway will be constructed. Is construction required or will you only designate a 600-meter band of the PR 186 right-of-way? If construction is required, you need to include specific plans for such in a revised DEIS. If such information is available elsewhere, please provide it to EPA and at a minimum, incorporate the material by reference in any revision. Based on how the document is currently written, it appears that no new construction will be required for the PR 186 byway.

If there is potential for landscaping, EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. For additional information, please see: <http://www2.epa.gov/greenerproducts/identifying-greener-landscaping-choices>.

Use of diesel equipment will be required during project activities. Clean diesel options should be considered. For new equipment, utilize contract specifications requiring advanced pollution controls and clean fuels; please see: <http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf> and <http://www.epa.gov/cleandiesel/technologies/index.htm>.

Consider implementing diesel controls, cleaner fuel, and cleaner construction practices for on-road and off-road equipment used for transportation, soil movement, or other construction activities, including:

- Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits; and
- Use of clean diesel through add-on control technologies like diesel particulate filters and diesel oxidation catalysts, repowers, or newer, cleaner equipment.

For more information on diesel emission controls in construction projects, please see: <http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>.

Thank you for the opportunity to comment on the DEIS prepared for the Revised Land and Resource Management Plan for El Yunque National Forest, PR. EPA rates the DEIS as EC-2 or "Environmental Concerns" and "additional information needed" in accordance with EPA's national rating system; primarily due to our questions about the byway corridor.

Our comments on the DEIS contained in this letter are intended to help provide useful information that will ultimately inform local, state and federal decision-making and review related to land and water resource use and impacts. Should you have any questions regarding the comments and concerns detailed in this letter, please feel free to contact Michael Poetzsch of my staff at 212-637-4147.

Sincerely,



Judy-Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch
Clean Air and Sustainability Division

