



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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JUN 27 2017

Scott Armentrout, Forest Supervisor
Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, Colorado 81416

RE: Draft Assessment Report for Forest Plan Revision

Dear Supervisor Armentrout:

The U.S. Environmental Protection Agency Region 8 is aware that the U.S. Department of Agriculture Forest Service (USFS) is in the process of preparing a Draft Assessment Report of current conditions on the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG). This document will provide available information regarding the baseline conditions of the Forests 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 GMUG Forest Plan, 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 the discussion of baseline conditions on the Forests. Please note that we would likely provide scoping recommendations, in accordance with our responsibilities under Section 102(2)(C) of the NEPA 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 will cover a broad spectrum of existing resource conditions in the Forests. Based on the available information, we have focused our initial recommendations for characterization of baseline conditions on the following: (1) water resources, including wetlands, (2) air quality, and (3) environmental justice.

(1) Water Resources, Including Wetlands

Existing Conditions

Existing resource conditions will provide the basis for an effective future analysis of potential impacts. Therefore, we recommend the Draft Assessment Report include the following baseline water resource information (see additional detail in sections below):

- A map and summary of planning area waters, including rivers, streams, tributaries, lakes, springs and wetlands. It would be helpful if the summary identified high resource value water bodies and their designated beneficial uses (e.g., agriculture, fisheries, drinking water, recreation);

- Watershed conditions, including vegetation cover and composition, soil conditions, and areas not meeting desired future conditions;
- Surface water information, including available water quality data in relation to current standards, stream functional assessments, stream channel/stream bank stability conditions, sediment loads and aquatic life;
- Types, functions and acreage of wetlands, riparian areas, and springs;
- Available groundwater information, including quality and location of aquifers; and
- Using the most recent EPA-approved list, a map of water body segments classified by the Colorado Department of Public Health and Environment (CDPHE) as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by the state; and water bodies that have not yet been assessed by the state 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 CDPHE can identify/validate any CWA Section 303(d) listed waterbodies in the planning area. The most recent EPA-approved 303(d) list for Colorado is dated 2016.

Water Quality Data: Water quality data for the streams and lakes of the analysis area provide important information to guide management for the Forests, as well as a baseline for future monitoring and evaluation of potential influence on downstream water quality. We recommend the Draft 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 within and downstream of the planning area. Identification of any significant gaps in data may be helpful in developing 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 from future USFS-authorized activities 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 could 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 Draft Assessment Report 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 may be an important resource to analyze if it provides domestic and/or public water supply in the analysis area. Groundwater quality is also important because groundwater may discharge to lakes and streams or be recharged by these water bodies. 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. We recommend the Draft Assessment Report include a map of all groundwater resources of the GMUG and discussion to include the following information, if available:

- Identification of major aquifers;
- Location and extent of groundwater recharge areas;
- Location of shallow and sensitive aquifers that are susceptible to contamination from surface activities, including alluvial aquifers along streams and rivers; and
- Location of existing and potential (i.e., those that can reasonably be used in the future) underground sources of drinking water (USDW).¹

Please include available groundwater quality information, and identify which shallow aquifers are sources for public water systems, domestic wells or stock wells. We also recommend identifying any public water systems in the planning area with water quality violations or with requirements for increased frequency of monitoring for contaminants. The CDPHE is a good source of information concerning aquifers. Robert Hillegas with the Water Quality Standards Program can be reached at (303) 692-3137 or robert.hillegas@state.co.us.

Public Drinking Water Supply Source Characterization: In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with future USFS-authorized activities in the planning area, it is important to identify where these sources are located. Therefore, the EPA recommends that the Draft Assessment Report include a map depicting municipal supply watersheds² and source water protection areas for public water supply wells and surface water intakes (streams, rivers, and reservoirs) in accordance with State data security requirements. We also recommend identifying reservoirs that are drinking water sources. Please note that more specific maps, available from the CDPHE, should be utilized by the USFS when locating future project activities. Please contact the CDPHE Source Water Protection Program (SWPP) Coordinator John Duggan at (303) 692-3534 or john.duggan@state.co.us for additional information and these Geographic Information System (GIS) layers.

Special Consideration for 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

¹ In general, this includes aquifers with a concentration of total dissolved solids (TDS) less than 10,000 mg/L and with a quantity of water sufficient to supply a public water system. Aquifers are presumed to be USDWs unless they have been specifically exempted or if they have been shown to fall outside the definition of USDW (e.g., $\geq 10,000$ mg/L TDS).

² Forest Service Manual (FSM2542) defines Municipal Supply Watersheds to include: "surface supply watersheds, sole source aquifers, and the protection zones around wells and springs."

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 Colorado, the U.S. Army Corps of Engineers revoked the use 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 available from the Colorado Natural Heritage Program and in the 2006 GMUG Comprehensive Assessments, Chapter 3 – Ecological Drivers, 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 Draft Assessment Report include a description and acreage of fens within the planning area.

Roads/Trails: We recommend that the Draft 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 road/trail activities such as 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

Air quality information will be an important component of this Draft Assessment Report given that the GMUG include or are near towns, CAA Class I Areas (e.g., West Elk Wilderness, Black Canyon of the Gunnison National Park) and Sensitive Class II Areas. In addition to the health-based National Ambient Air Quality Standards (NAAQS) that protect ambient air quality, the CAA provides Class I Areas with special protection for air quality and air quality related values (AQRVs), including visibility. Sensitive Class II Areas are areas for which Federal Land Managers have identified air quality and/or AQRVs as valued resources. The EPA recommends that the Draft Assessment Report disclose the current air quality conditions in and near the planning area.

Existing Conditions

We recommend that the USFS characterize existing air quality conditions to set the context for evaluating future USFS-authorized activities. To that end, we recommend the Draft Assessment Report include the following:

- Identification of sensitive receptors in the vicinity (such as population centers, Class I Areas and Sensitive Class II Areas);
- Airshed classifications and baseline conditions at nearby population centers;

- Available emissions inventory data for the planning area and disclosure of any regional concerns in the area (e.g., particulate and/or ozone issues); and
- Trends in air quality at nearby Class I Areas over the past several years.

Such data are available from CDPHE and/or the VIEWS site for air quality related values (AQRVs) (<http://views.cira.colostate.edu/web/>). The most current National Emission Inventory data is available at <http://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data>. Decision-makers will need to understand baseline conditions in an effort to ensure that future USFS-authorized forest management activities, when combined with air quality impacts from other sources, do not adversely impact the NAAQS or AQRVs such as visibility.

Oil and Gas Development: We recommend that the Draft Assessment Report provide a discussion of any past or present oil and gas activity on the GMUG, the status of existing leases, and the availability of the forests for leasing. We also recommend that the Draft Assessment Report include information regarding reasonably foreseeable development (RFD) scenarios for the area. Without more detail on an updated RFD, it will be difficult to definitively identify the appropriate level of air quality analysis should a Forest Plan revision be deemed necessary. At the outset of the NEPA process that will include an oil and gas leasing analysis, the EPA would like to have discussions with the USFS regarding the air quality impact analyses, consistent with the process described in the June 23, 2011 National Memorandum of Understanding regarding air quality analyses and mitigation for federal oil and gas decisions through NEPA.

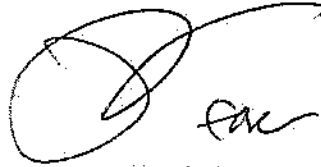
(3) Environmental Justice

It appears that the GMUG planning area may include minority or low-income populations. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. In order to ensure that the future NEPA analysis associated with this forest plan revision will be consistent with this order, the EPA recommends that, as a first step, the Forest Assessment include identification of any minority, low-income and tribal communities within the geographic scope of the impact area, including the sources of data and a description of the methodology and criteria utilized. The EPA recommends comparing census block group percentages (if available, or, at a minimum, census tract data) for below poverty and minority populations with the state average. The EPA does not recommend use of higher thresholds.

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 understanding that this assessment will inform the Affected Environment chapter of an EIS should the USFS determine that there is a need to change the existing GMUG Forest Plan. If further explanation of our comments is desired, please contact me at 303-312-6704, or your staff may contact Ethan Aumann at (303) 312-6773 or aumann.ethan@epa.gov.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a smaller, more legible signature.

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