



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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DEC 07 2017

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

Dear Supervisor Armentrout:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service November 2017 Draft Assessment Report of current conditions for the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG). These documents provide available information regarding the baseline conditions of the Forests and are 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 for 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 covers a broad spectrum of existing resource conditions for the Forests. Please note that we did not review the Draft Assessment Report in its entirety, but focused our review efforts on the following topics: (1) water resources, including wetlands, and (2) environmental justice. We were unable to review baseline air quality conditions in the Forests because the air quality portion of the Draft Assessment Report has not yet been released. We refer the USFS to our June 27, 2017, pre-scoping letter for recommendations on the characterization of baseline air quality conditions for the Forests. After the release of the air quality portion of the Draft Assessment Report, we may have additional comments regarding this topic.

(1) Water Resources, Including Wetlands

The Draft Assessment Report provides qualitative discussions of baseline conditions for a variety of water resource topics and some quantitative data. We recommend providing additional information for the EIS phase of the forest plan revision process, including quantitative data and maps, as appropriate and where not previously supplied, for the following issues (see the sections below for additional detail):

- A map 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);

- Additional 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;
- Additional groundwater information, including available groundwater quality data and location of aquifers; and
- Using the most recent EPA-approved list (currently 2016), 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 appreciate the inclusion of the table of impaired streams for the GMUG.

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. The Draft Assessment Report includes a narrative description of water quality for the Forests and a table of impaired streams with their identified pollutants. In addition to this information, we recommend the Draft Assessment Report provide a summary of available monitoring data on water quality for the planning area, including parameters such as total nitrogen, total phosphorus, total suspended solids, and temperature 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: As discussed in the Draft Assessment Report, 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 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. The Draft Assessment Report indicates that approximately 31% of the Forest area has an erosion hazard rating of severe or very severe. If soil erosion may result in 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: 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. 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: The Draft Assessment Report notes that surface waters for the GMUG are used for drinking water supplies and other purposes. 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 watersheds¹ 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, may 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: The Draft Assessment Report includes a qualitative discussion of wetlands, including a description and acreage of fen wetlands within the planning area. We note the value of including this information. We also suggest considering the inclusion of a map identifying the location of sensitive fen wetlands within the planning area. 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.

Roads/Trails: The Draft Assessment Report discusses some instances where forest roads may follow or cross streams and flood plains, and their potential impacts to water resources. We recommend that the USFS include a map identifying the existing forest roads and trails network along 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 roads and trails impacts to water resources.

(2) Environmental Justice

The Draft Assessment Report includes a discussion of environmental justice in the GMUG planning area. The Draft Assessment Report uses U.S. Census Bureau data to evaluate minority, low-income and

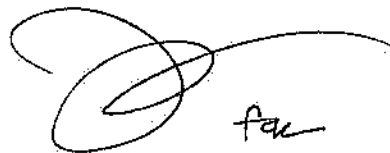
¹ Forest Service Manual (FSM2542) defines Municipal Supply Watersheds to include: "surface supply watersheds, sole source aquifers, and the protection zones around wells and springs."

tribal populations using two approaches; an evaluation at the county level and a second approach comparing block group data. The assessment identifies several areas that meet the criteria to be considered environmental justice populations. We note the value of including this information and encourage the USFS to continue to take these environmental justice populations into consideration during their planning process.

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 USFS determine that there is a need to revise the existing GMUG Forest Plan. If further explanation of our comments would be helpful, 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 horizontal line and the initials "fas" written below it.

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