



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

January 14, 2020

Ms. Laura Jo West  
Forest Supervisor  
Coconino National Forest  
1824 South Thompson Street  
Flagstaff, Arizona 86001

Subject: Draft Environmental Impact Statement for the Four Forest Restoration Initiative Rim Country Project, Coconino, Gila, Navajo, and Yavapai Counties, Arizona (EIS No. 20190252)

Dear Ms. West:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA strongly supports the objectives of the Four Forest Restoration Initiative (4FRI). We reviewed the 4FRI Draft EIS and provided comments to the Forest Service on May 16, 2013. In our comments, we praised the Forest Service for its dedication to public outreach and collaboration and the efforts made to incorporate the best available science into the DEIS. The EPA subsequently submitted scoping comments for the 4FRI Rim Country DEIS on August 15, 2016, with suggested recommendations for the Forest Service to consider on a range of issues, including air quality, environmental justice, and climate change. The EPA appreciates the information included in the DEIS to address many of our suggestions, as well as the additional analyses provided, in response to stakeholder and public involvement, to address issues such as treatments in Mexican spotted owl protected activity centers, treatments in northern goshawk habitat, and large tree retention.

We recognize the challenge the Forest Service faces in implementing a project that will rely heavily on prescribed burns and pile burning of residual forest fuels to achieve restoration objectives. The "Fire Ecology and Air Quality Specialist Report" that the Forest Service prepared for this project explains these challenges well. Although the proposed restoration areas meet all federal ambient air quality standards, the fine particulate matter generated during fuel treatments does present a human health risk (p. 208). We recommend that the Forest Service work with the interagency Smoke Management Group and commit, in the Final EIS and Record of Decision, to implement best management practices to reduce emissions from prescribed burns and other fuel treatments to the greatest possible extent. We also recommend that the Forest Service analyze and include a description, in the FEIS, of the potential for further reductions in air emissions from fuel treatments by lessening or eliminating pile burning of residual fuels in favor of biomass energy production and/or deploying mobile air curtain incinerators, a device currently being tested by air quality officials with Coconino County. The reduction in emissions achieved from utilizing air curtain incinerators to process residual fuels can be considerable; according

to a report prepared by Forest Service scientists with the Rocky Mountain Field Station, Fire Sciences Laboratory, emissions from prescribed burns average 36 pounds per ton of particulate matter (PM<sub>2.5</sub>), and emissions from pile burns average 25.5 pounds, while the emissions from an air curtain incinerator average only 1.1 pound per ton.

We note that effective October 22, 2018, the EPA no longer includes ratings in our comment letters. Information about this change and the EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act>. The EPA appreciates the opportunity to review this DEIS, and we are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: TIP-2). If you have any questions, please contact me at 415-947-4167, or contact Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,



Jean Prijatel, Manager  
Environmental Review Branch