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District Ranger Simino:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service August 18, 2021, Draft Environmental Assessment (EA) for the Southern HDs Landscape Restoration Project (Project). This Draft EA evaluates the use of vegetation treatments including mechanical, hand treatment, managed grazing, and prescribed burning on approximately 35,000 acres of national forest land located within the Columbine Ranger District of the San Juan National Forest. The proposed project aims to create and maintain vegetation conditions that support desirable fire behavior, improve forest ecosystem diversity and wildlife habitat, increase forage production for grazing, decrease financial costs of wildfire suppression, and reduce risk to life, property, cultural, and natural resources from wildfire. We offer the comments below consistent with our authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA).

Site Specificity and Periodic Review

The Draft EA appears to resemble a programmatic NEPA document because it does not include the level of site-specific action planning and impact analysis typical of past individual project-level NEPA planning documents. As a result, it appears the Project will rely on design elements and best management practices (BMPs) to manage the uncertainty in the effects analysis as site-specific actions are implemented. Ideally, we recommend as much available site-specific information be included in the Final EA such as maps showing specific treatment areas, and potential treatment methods and mitigation measures for each area based upon site specific resources and conditions. If this is not practical for the Project, we recommend USFS consider public notification and the opportunity to provide input on the site-specific treatment plans. We also recommend outlining how the public notification process will work in the Final EA.

The Draft EA does not provide a specific project duration, rather it states it can be implemented in phases over several years. For long-duration projects, drought, intense precipitation events, fires, insects, and new invasive species could alter the landscape and thereby alter USFS management priorities. Given the potential for changing circumstances over the life of the Project, we recommend the USFS

conduct a NEPA sufficiency review every 10 years if the project duration exceeds 10 years. We also recommend describing how the NEPA sufficiency review process will work in the Final EA. Over the past decade alone there have been changes in wildlife species status, and an ongoing improvement in the science to support resource management decisions that inform how the USFS manages its resources. We expect those changes to continue over the decades ahead. In addition to 10-year reviews, we offer the following examples of additional potential triggers for NEPA sufficiency review: monitoring or observational results showing impacts outside of those anticipated in this analysis; relevant new requirements or stipulations from future Forest Plan revisions or regulatory changes relevant to the Project; a change in project context resulting from wildfire, flood, drought, disease, invasive species or other changes affecting the project landscape or exacerbating the Project's environmental impacts; and a Threatened and Endangered Species review. We also recommend the NEPA sufficiency review involve a public disclosure process (e.g. a notice in the paper and availability of documentation electronically) which could give the public an opportunity to submit new information to USFS.

Aquatic Resources

The Draft EA states there are no known or previously mapped wetland areas in or immediately adjacent to the analysis area, but it notes there are approximately 690 acres of different riparian ecological communities within the Project Area. These communities are almost always associated with stream courses, springs/seeps and low-lying swales in this landscape and range from highly saturated with considerable organic matter to mesic meadows that dry out by July. Based on this description, wetlands are likely present within the Project Area. Wetlands support riparian grasses and grass-like vegetation, shrubs and trees which aid in bank protection and soil stabilization. Given the potential for wetlands in the area, EPA recommends the USFS either conduct a wetland delineation and correspond with U.S. Army Corps of Engineers to ensure compliance with Section 404 of the Clean Water Act prior to any disturbance or by default, treat mesic meadows as wetlands and apply protections equivalent to other wetlands.

According to the Draft EA the USFS used the Watershed Condition Framework in 2012 and 2021 to assess watersheds within the analysis area. It notes four of the nine watersheds within the analysis area were identified to be Functioning at Risk during the initial assessment in 2012, but that number moved up to seven of nine in the 2021 reassessment (p. 33). Additionally, surveys in 2018 using the Bureau of Land Management's Proper Functioning Condition (PFC) protocol found a majority of stream and riparian areas were Functioning at Risk and the USFS identified grazing and road/trail impacts as the primary drivers (p. 40). Forest management under the current Forest Plan using standard BMPs and non-prescriptive water resource design features does not appear to be moving streams and riparian areas toward desired conditions. It is therefore important that project actions be designed with particular care to avoid additional impacts. Given the negative trends in stream and riparian health identified in the Draft EA, wherever possible the Project should be designed to improve stream and riparian conditions. This Project will increase the use-intensity in the Project Area, and the lack of site-specific analysis and the lack of commitment to specific actions to improve water resource conditions, makes it difficult to determine whether these under-functioning stream areas will be negatively impacted or improved. To help mitigate the potential effects of the Project, we recommend the Final EA identify actions that could

be taken to move riparian areas, wetlands and water quality toward Properly Functioning Condition (USFS) and/or PFC (BLM). Incorporating specific actions or management changes in the Project (*e.g.* applying integrated riparian and soil erosion management, adding riparian exclusion fencing in particularly sensitive or degraded areas, route management, bringing USFS Forest Service Roads and culverts to Forest Service Best Management Practice standards, etc.) as recommended by USFS's resource experts could improve aquatic resources and the forest ecosystem of the Project Area. We also recommend monitoring specific vegetation treatments and prescribed burn area efforts annually for five years (or longer if needed) to ensure successful ecosystem improvements, soil stabilization, control establishment of noxious plants, and to determine potential impacts to PFC and water quality. If additional analysis is needed to identify actions for some specific streams, we recommend specifying a schedule for that analysis in the Final EA and dedicating the resources necessary to accomplish this expediently.

Air Quality

Based on the review of the Draft EA we recommend that information on air quality be included to support the Final EA and Finding of No Significant Impact (FONSI). These recommendations focus on characterizing existing conditions and communicating the degree to which air quality would be expected to be affected considering the acreages to be treated annually and in total.

Existing Conditions: We recommend consulting with the Colorado Department of Public Health and the Environment (CDPHE) to present background air quality design values as compared to each respective National Ambient Air Quality Standard (NAAQS). In addition, we recommend narrative discussions to explain the numeric design values and NAAQS in plain terms such that the public can understand the overall quality of the air. We recommend identifying any monitoring data that would be representative of smoke impacts from wildfire or prescribed burning and explain the nature of the source relative to the impact.

Environmental Consequences: EPA recognizes and supports the use of prescribed fire as an important forest management tool that can have multiple benefits. Some of these benefits include minimizing invasive species, improving wildlife habitat, increasing nutrient cycling, promoting vegetation growth, and protecting human life and property by reducing hazardous fuels. However, smoke from prescribed burning can also have impacts on air quality and is a source of fine particulate matter ($PM_{2.5}$ aerodynamic diameter <2.5μm) which can affect human health. We recommend the USFS conduct an analysis of potential air impacts prior to finalizing the scope of annual activity. To accomplish this, we recommend identifying the average burn size (in acre, and corresponding fuel loading; or in tons of fuel for pile burning etc.) and then total annual acreage proposed for treatments including annual fuel associated with all treatment methods based on vegetation cover. Using the treatment type (e.g. pile burn, open burn, air curtain destructor) and fuel loading (i.e. fuel type and mass) we recommend calculating emissions of criteria pollutants for both an average burn as well as ton per year totals. We recommend including information to place the emissions from a typical burn in perspective such as the duration and quantity of the emission release.

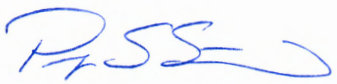
EPA supports the USFS's proposed notification of burn plans to commercial big game outfitters and Tribes. We recommend the USFS consider prescribed fire design criteria and monitoring requirements

for the Final EA, including: (1) incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2017) into the site-specific burn plans designed for each prescribed burn conducted under this Project, and (2) public notification of pending burns. We also recommend that the USFS consult with the CDPHE for any coordination necessary related to burns, modeling, mitigation, or other measures required under State regulations or the State Implementation Plan to address Clean Air Act requirements. We recommend that the NEPA document clearly explain the planning and procedure that will be followed regarding prescribed burns.

The potential for distant wildfires to impact communities has increased as the frequency of larger more destructive wildfires has increased. Therefore, we recommend managing activities conducted in the Southern HDs such that monitored PM_{10} concentrations near the Project Area are not greatly affected by the additional emissions from planned prescribed fire. We recommend that the FONSI include provisions that burn plans be reevaluated if monitoring shows elevated PM_{10} at adjacent monitors is attributable to prescribed fire from the Project and use that information to further improve burn practices and minimize emissions and impacts to the surrounding communities.

We appreciate the opportunity to review this Draft EA. If further explanation of our comments is desired, please contact me at (303) 312-6704, or your staff may contact Kyle B. Corcoran, the Lead Reviewer for this Project, at (303) 312-6155 or corcoran.kyle@epa.gov.

Sincerely,



Philip S. Strobel
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Electronic cc: James Simino, USFS District Ranger