



REGION 3

PHILADELPHIA, PA 19103

Dear Ms. Howard,

Thank you for providing notice on August 6, 2024, of the U.S. Forest Service's (USFS) proposed Red Spruce-Fir Ecosystem Restoration project in the Cherokee National Forest (CNF), George Washington and Jefferson National Forests (GWNJF), Monongahela National Forest (MNF), and the National Forests in North Carolina (NFsNC). The project proposes various red spruce restoration practices and vegetation management techniques to create favorable conditions for red spruce in suitable habitat locations or former red spruce locations. The U.S. Environmental Protection Agency (EPA) has reviewed the Scoping Document and is providing recommendations for your consideration in the development of an Environmental Assessment (EA), pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508).

Purpose and Need, Proposed Action

- EPA appreciates that this project identifies the need for red spruce restoration across administrative, state, and forest boundaries. We recognize each National Forest has specific environmental conditions, Forest Plans, and state regulations. We recommend assessing the environmental impacts of the proposed actions for each of the National Forests contained within the project.

Biological Resources

- The analysis should address the full range of potential adverse and beneficial impacts to species, including temporary disturbance, loss or gain of habitat, and impacts to food sources. Potential impacts to species of concern, including federally listed Threatened and Endangered Species, state listed species, and Birds of Conservation Concern should be considered. We recommend indicating avoidance measures and documenting consultation with the U.S. Fish and Wildlife Service or other agencies in the appendix.
- Potential use of pesticides for forest management should also be addressed, in addition to the herbicide treatments proposed for interfering and non-native invasive vegetation.
- In accordance with the [March 21, 2023 CEQ Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors](#), EPA recommends full consideration of habitat connectivity and corridors and how the proposed action can support the management, long-term conservation, enhancement, protection, and restoration of year-round habitat, seasonal habitat, stopover habitat, wildlife corridors, watersheds, and other features and processes that promote

ecological connectivity. See: <https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf>.

Climate Change and Greenhouse Gas Emissions (GHGs)

- On January 9, 2023, CEQ published [interim guidance](#) to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews in response to EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. EPA recommends the USFS apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation. See: <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>.
- Climate change may have a range of impacts on forest health and ecosystems. We recommend the analysis include a discussion of how the proposed management actions will achieve a healthy, diverse, and resilient ecosystem and will diminish the risks and consequences of forest health threats in light of the shifting climate.
- Vegetation management practices can generate short-term biogenic emissions while resulting in long-term net reductions. EPA recommends using relevant tools to analyze the anticipated long-term GHG emissions implications from proposed ecosystem restoration actions. The analysis should discuss the potential GHG impacts of this project and explore strategies that can be implemented to reduce GHGs. The following resources may support your analysis:
 - [U.S. EPA - Inventory of U.S. Greenhouse Gas Emissions and Sinks](#). The Inventory provides guidance on emissions quantification, activity data sources, and default emission factors for forestry and agriculture practices in Chapter 6. <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>
 - [USDA - Quantifying Greenhouse Gas Fluxes in Agriculture and Forestry: Methods for Entity-Scale Inventory](#). This report identifies best practices for quantifying GHG emissions and removals from agricultural and forestry activities. https://www.usda.gov/sites/default/files/documents/USDATB1939_07072014.pdf
 - [USFS - Forest Vegetation Simulator](#). Forest Vegetation Simulator models changes in forest succession as a result of disturbances or management decisions. Outputs include tree volumes, biomass, density, canopy cover, harvest yields, fire impacts, as well as other variables. <https://www.fs.usda.gov/fvs/>

Environmental Justice and Public Engagement

- Executive Order 12898 *Federal Actions to Address Environmental justice in Minority Populations and Low-Income Populations*, February 11, 1994 was supplemented by Executive Order (EO) 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All* on April 26, 2023. EO 14096 directs federal agencies, as appropriate and consistent with applicable law: to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns. Section 3 (b)(i) of EO 14096 also directs the EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with

environmental justice concerns when carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609. To assist in this analysis, we recommend referencing the following resources:

- EPA EJScreen tool at: <https://www.epa.gov/ejscreen>
- CEQ Environmental Justice Guidance under NEPA:
https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf.
- EPA appreciates USFS' opportunity for public involvement in the scoping phase of this project, and we encourage continued outreach and coordination with tribes and the local community during the project to identify and minimize potential adverse effects associated with the project, and to collaborate on opportunities for other beneficial impacts. We recommend that USFS continue to work closely with federal, state, and local agencies.

EPA supports the overall goals of the project. Thank you for the opportunity to provide scoping comments as early coordination in the NEPA process. We look forward to continued participation in the NEPA process and request an electronic copy or link to the draft EA documents be send when available to (esch.emma@epa.gov) or Jamie Davis (davis.jamie@epa.gov). Please feel free to reach out with any questions.

Sincerely,

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