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Comments: CGNF RFP DEIS - EPA Comments

Mariah,

Good morning! Attached are EPA's comments on the Custer Gallatin RFP and DEIS. These have been uploaded into the USFS electronic submittal portal, and a hard copy will be following in the mail. I just wanted to send a courtesy copy to you directly. Please let me know if you have any questions or would like to discuss.

Thanks for the opportunity to participate in this review. I have not been in NEPA long, but I think the Custer Gallatin had a fantastic outreach campaign, and set the bar really high for public outreach on this project.

Shannon

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The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture

Forest Service's March 2019 Custer Gallatin National Forest (CGNF) Draft Revised Forest Plan (RFP) and Draft

Environmental Impact Statement (EIS) (CEQ No. 20190019) pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA). The CGNF administers approximately 3,039,000 acres in Montana and South Dakota.

For planning purposes, the RFP arranges the CGNF into six distinct geographic areas ranging from 78,000 acres to 1.4 million acres. The RFP will guide management of the CGNF and replace the existing 1986 and 1987 plans for the Custer National Forest and the Gallatin National Forest which were formerly managed separately. With this revision, the CGNF intends to propose a Forest Plan that is consistent with the 2012 USFS Planning Rule. EPA provided scoping comments for this Draft EIS in a letter dated March 5, 2018. The Draft RFP and Draft EIS is programmatic in nature and will guide forest management decisions for the next 10-15 years. It updates forest-wide existing conditions and provides standards and guidelines to protect air, soil and water resources from potential impacts associated with USFS-authorized activities. Our recommendations for protection of water and air resources, while meeting the purpose and need, are provided in the enclosure for your consideration.

Effective October 22, 2018, EPA no longer includes ratings in our comment letters. Infrmnation about this change and EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: https;//www.epa.gov/nepa/environmental-irnpact-statement-rating-system-criteria.

We would like to acknowledge the USFS staff for their willingness to coordinate at the beginning stages of this effort, their availability to answer questions during our review, and their engagement at the CGNF Science of Forest Planning seminar in Big Sky, MT. We appreciate the opportunity to participate in the review of this Draft RFP and Draft EIS. We are committed to working with you as you prepare the Final EIS.

ENCLOSURE- Detailed Comments

Water Resources, including Wetlands: During the CGNF's forest planning process assessment and scoping phases, EPA provided comments regarding existing resource conditions. There were several important topics associated with forest planning we recommended for discussion in the Draft EIS, including the recommendation to provide maps illustrating planning area water resources. Maps help the reader understand where current Forest activities are located in relation to important resources and help the decision maker effectively plan to reduce potential impacts to such resources to the greatest extent possible while providing for the Forest's multiple uses. EPA recommends the Final EIS include the following maps to compliment the Chapter 3 existing conditions and environmental impacts discussion.

* A map(s) of planning area waters, including major rivers, lakes, springs, and wetlands (including fen wetlands).
* A map of303(d) listed waterbodies.
* A map, appropriate for public dissemination, showing generalized locations of all source water assessment and protection areas associated with public drinking water supply wells and surface water intakes (streams, rivers, and reservoirs).
* A map of groundwater resources, including the identification of major aquifers; location of shallow

aquifers (including alluvial aquifers along streams), location and extent of groundwater recharge areas; sole source aquifers; and location of existing and potential (i.e., those that can reasonably be used in the future) underground sources of drinking water (USDW).1

We w1derstand that the USFS's National Groundwater Program is in the process of developing a nationwide bedrock hydrogeology layer_, including major alluvial aquifers, that will allow a forest to create its own map. In the interim, individual forest requests can be directed to the National Groundwater Program staff(see internal USFS website at https://www.fs.fed.us/science[shy]technology/geology/groundwater/mapping). EPA recommends including such a map as part of the Draft EIS to inform the siting of management areas and future USPS-authorized activities to protect vulnerable resources.

Potential Impacts ofBeetle Epidemic: EPA recommends the Final EIS provide an assessment of the potential for organic loading impacts to drinking water supplies associated with municipal watersheds i11 the planning area. The presence and handling of beetle-killed trees has the potential to impact public water supplies if it leads to organic loading in area waterbodies that are sources of drinking water.

Organic matter interacts with disinfectants used in the drinking water treatment process to fo1m disinfection byproducts, which are a human health concern. Organic loading may also decrease oxygen levels leading to the release of metals such as arsenic, manganese, and iron from sediment. For more

1 In general, this includes aquifers with a concentration of total dissolved solids (TDS) less than

I 0_,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 ofUSDW (e.g., 2'. I 0,000 mg/L TDS).

information, see Mikkelson, Ket al. 2013, 'Bark beetle infestations affect water quality in the Rocky Mountains of North America' GWF Discussion Paper 1306, Global Water Forum, Canberra, Australia.

Surface Water and Riparian Existing Conditions: The Draft EIS identifies 34 waterbodies or stream reaches in the Planning Area that are on the most recent Montana 2016 Clean Water Act (CWA) Section 303(d) list of impaired waters. Table 14 in the Draft EIS quantifies the number of 303(d) listed streams in each geographic area of the CGNF, the sources of pollutants_, and which waterbodies have TMDL Assessments. According to the table, grazing activity is one of the sources of pollutants to these impaired streams.

The USFS's Pennitted Livestock Grazing Specialist Report referenced in the Draft EIS identifies the current

condition of riparian and wetland resources in the CGNF. It states that data from wetland/riparian area proper functioning condition assessments in 1998 and 2003 generated estimates of conditions for the Assessment Report. The USFS's condition categories include: Proper Functioning Condition, Functioning at Risk with an upward or downward trend, and Non-Functional. Riparian conditions are closely correlated to water quality. The Grazing Report states that, "within the primary rangelands permitted for grazing in the overall assessment area, 71 percent of the survey sites were in proper functioning condition, with 27 percent functioning at risk and 2 percent rated as non-functional. Within the montane units, 72 percent of the-survey sites were in proper functioning condition, with 25 percent functioning at risk and 3 percent rated as non-functional. Within the pine savanna units, 58 percent of the survey sites were in proper functioning condition, with 42 percent functioning at risk and none rated as non-functional." EPA requests the Final EIS discuss how each of the proposed alternatives work toward restoring impaired streams and moving functioning at risk and non-functional streams toward proper functioning condition.

Air Quality:We support the prescribed fire procedures identified by the Montana/Idaho Airshed Group and referenced in Draft EIS in S[middot]ection 3.2. We recommend the Final RFP include the management measures that will be applied to prescribed fire treatments to minimize impacts to air quality. We note the Draft EIS describes adherence to the current state smoke management plan and MDEQ requirements that will mitigate the impacts of air pollution frQm prescribed fire operations, but no details are provided.

Table 12 in Section 3.2.3 of the Draft EIS projects the average acres per decade ofwildland and prescribed fire for each oftl1e proposed alternatives. Although the individual bum plans prepared for future prescribed fire activities will quantify expected emissions, we recommend th Final EIS provide an estimate, by alternative, of predicted emissions that may result from future burn-related treatments (or at least a qualitative discussion of the types of pollutants expected to be generated).

If proposed management areas will allow substantial vegetation management and harvesting activities, we recommend the Final EIS include a qualitative discussion of air emissions that may result from foreseeable harvesting and thinning of trees and associated activities. The Preferred Alternative identifies 582, 338 (19% of the CGNF) of forested acres suitable for timber production and 592, 261 (19%) of forested acres that are unsuitable for timber harves,t but where timber harvest may occur for other purposes, such as vegetation management. Emissions from heavy diesel equipment utilized for

removal and thinning of trees, idling trucks used for transportation of wood products, and re-entrained dust generated from USFS-authorized activities may negatively impact air quality. Road dust control and limiting truck idling are among the measures available to manage localized impacts from these USFS authorized activities.

Oil and Gas Development: The Renewable and Nomenewable Energy and Mineral Resources Specialist Report references numerous Bureau of Land Management (BLM) reasonably foreseeable development (RFD) scenarios developed for previous and ongoing BLM resource management activities across the CGNF planning area. The

Draft EIS notes that prior to lease offer, most areas would require an oil and gas leasing analysis. Without more detail on an estimated RFD, updated and specific to the CGNF, it is difficult to identify the appropriate level of air quality analysis for this planning effort. At the outset of the NEPA process that will include an oil and gas leasing analysis, EPA would like to have discussions with the USFS regarding the air quality impact analyses and appropriate mitigation measures, 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.

Monitoring: The Assessment Report identified monitoring needs related to several resource areas, e.g., air, soil, and water resources. The Draft RFP includes elements to assess detrimental soil disturbance, Riparian Management Zone condition and watershed condition improvement. We support these identified needs as the foundation of the USFS's monitoring plan, Several of the following monitoring components are found in the Helena-Lewis and Clark RFP, and we recommend these for the CGNF Final RFP.

* Metrics to assess water quality data gaps in order to provide a baseline for future monitoring of impacts and evaluation of potential influence on downstream water quality.
* Enhanced monitoring of resource conditions adjacent to high value water resources to ensure timely adjustment ofBMPs and informed management decisions.
* Monitoring the number of and types of BMPs implemented in wetlands, and the quality at which the BMPs are implemented.
* Monitoring the number and locations of CWA 303(d) and 305 State listed streams; the acres, miles, and types of actions that will improve the reasons for which the stream was listed; and the MT State assessment of Beneficial Uses status (fully supporting, not fully supporting, threatened) for each listed stream segment.
* Monitoring forestwide air quality for compliance with Clean Air Act and Wilderness Act requirements (National Ambient Air Quality Standards (NAAQS), Regional Haze, Air Quality Related Values) by using available NAAQS monitoring stations, the State Region Haze Plan, and IMPROVE monitoring sites.
* Monitoring whether new and revised livestock management plans are designed to maintain water quality by measuring miles of intermittent and perennial streams moving towards desired conditions, the number of improvement strategies expected to move RMZs toward desired conditions, and the end-of-season stubble height of hydrophilic vegetation along the greenline (Guideline FW-GDL[shy] GRAZJ.

Finally, we recommend the Forest Plan describe what actions would be taken to assure the Plan's resource protection objectives will be met if funding for the monitoring is not available.