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First name: Jean

Last name: Prijatelj

Organization:

Title: Manager

Comments: Subject: Draft Environmental Impact Statement for the Tonto National Forest Land Management

Plan, Coconino, Gila, Maricopa, Pinal, and Yavapai Counties, Arizona (EIS No. 20190291)

Dear Mr. Bosworth:

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 recognizes the many challenges inherent in developing a land management plan that strives to satisfy the public's desire for recreational opportunities while at the same time protecting and restoring sensitive resources. The EPA supports many of the main features of the proposed land management plan for the Tonto National Forest, including the emphasis on conducting vegetation treatments in frequent-fire forested systems, and the focus on restoring riparian areas, including stream channel and habitat restoration, watershed restoration, and invasive species removal. The EPA appreciates that the proposed plan, Alternative B, was modified to respond to key issues identified by the public during the scoping process and allows for adaptive management to address potential ecological changes.

The Draft Environmental Impact Statement notes that the Tonto National Forest currently does not have a forest-wide designated road or trail system and cross-country motorized travel is permitted except in areas that are designated closed or restricted to seasonal use according to the 1985 Forest Plan (Volume 1, p. 61). In a phone conversation with Jason Gerdes of my staff, Kenna Belsky, Forest Planner for the Tonto National Forest, mentioned that the Forest Service hopes to issue the Record of Decision for the Tonto National Forest Travel Management Plan EIS in the coming months. The EPA reviewed and submitted a comment letter for the DEIS for the Tonto National Forest Travel Management Plan on September 17, 2014. While recognizing in the DEIS letter that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses, the EPA expressed significant concerns regarding impacts associated with off-highway vehicle use on the Forest, particularly the continuing air impacts associated with OHV travel on unpaved roads and routes. We also expressed concern about the impacts of user-created routes on hydrology and aquatic habitats. In the years since the publication of the Travel Management Plan DEIS, the Forest has become increasingly popular with the public, especially OHV enthusiasts; this only heightens our concerns and highlights the need to formalize a Travel Management Plan that eliminates problematic user-created routes and decommissions roads that are negatively impacting aquatic habitats. The current DEIS generally describes the environmental effects of roads in the Forest but is missing a broader discussion of how the analysis and conclusions from the Travel Management Plan informed the development of the Tonto National Forest draft Land Management Plan. We recommend the Forest Service include a section in the Final EIS detailing the status of the Travel Management Plan and describing how the finalized Travel Management Plan will inform management decisions for the Forest as a whole.

We recognize the complexities of implementing a management plan that will rely heavily on prescribed burns and pile burning of residual forest fuels to achieve restoration objectives. This challenge is exacerbated by the fact that several nonattainment areas lie near the Tonto National Forest or include parts of its domain: the Maricopa County particulate matter IO micrometers or less (PM<sub>10</sub>) and ozone nonattainment areas, the Payson PM<sub>10</sub> nonattainment area, Miami nonattainment areas for sulfur dioxide (SO<sub>2</sub>) and PM<sub>10</sub>, and the Hayden nonattainment areas for PM<sub>10</sub> and SO<sub>2</sub> (Volume 2, p. 186). We recommend that the Forest Service work with

the interagency Smoke Management Group and commit, in the FEIS 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 future forest 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 averages 36 pounds per ton of particulate matter 2.5 micrometers or less in diameter (PM<sub>2.5</sub>), and emissions from pile burns 25.5 pounds, while the emissions from an air curtain incinerator creates 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-undersection-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