

Data Submitted (UTC 11): 3/19/2014 12:00:00 AM

First name: Kathleen

Last name: Martyn Goforth

Organization: Environmental Protection Agency, Region IX

Title: Manager

Comments: The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Coconino National Forest Land and Resource Management Plan (Coconino Plan) pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA strongly supports the goals of the Coconino Plan. The implementation of measures to achieve these goals (which include the maintenance and improvement of ecosystem health), such as updating "management direction for riparian, aquatic, and water resources" and addressing the "importance of habitat connectivity," should help to address major challenges, including surrounding development and the effects of climate change, confronting present and future Coconino planners.

Based on our review of the subject DEIS, we have rated the Preferred Alternative and the document as (L0-1) Lack of Objections - Adequate (see the enclosed "Summary of EPA Rating Definitions"). The EPA recognizes the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives, so long as such activities are implemented in a way that reduces impacts to the environment as much as possible. We commend the Forest Service for committing, in the Preferred Alternative, to strong best management practices and soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments. As further described below, EPA recommends considering additional wilderness acreage designation, as well as confirming in the Record of Decision the measures identified in the DEIS for mitigating climate change effects and reducing air quality impacts.

#### Maximize Forest Resiliency through Wilderness Designation

We recommend that the Forest Service consider adding wilderness acreage to the Preferred Alternative comparable to the amount included in Alternative C. The DEIS states that under Alternative C additional wilderness acres would be recommended on the forest to "provide additional protection to botanical and wildlife resources" (p. 20). Considering the management challenges facing Coconino planners (both currently, and over the life of the revised Plan), including encroaching development and the effects of climate change, among other pressures, and the stress these pressures will bring to bear on Coconino resources, particularly sensitive plant and animal species, it would seem most prudent to implement a Preferred Alternative with the maximum possible wilderness acreage, thereby ensuring the greatest forest resiliency and maximizing the achievement of restoration objectives.

#### Mitigate Impacts from Climate Change

The EPA commends the Forest Service as well for devoting considerable attention to climate change in the proposed Coconino Plan- both in assessing potential effects, as well as developing novel management strategies to mitigate and respond to these effects. We recommend that the Final EIS and Record of Decision include a commitment to mitigate climate change effects, and to adapt management strategies accordingly, for the duration of the Coconino Plan revision.

#### Reduce Impacts to Air Quality

We recognize the challenge the Forest Service faces by implementing a land and resource management plan that will rely heavily on prescribed burns and wildfire to achieve Plan objectives. We commend the Forest Service for acknowledging the potential air quality impacts associated with these treatments by proposing a revised

Coconino Plan that identifies "guidelines and management approaches for reducing smoke emissions" (p. 18). Though the Coconino National Forest has good air quality, the fine particulate matter generated during wildland fire does present a human health risk. We recommend that the Forest Service implement BMPs and work with Arizona Department of Environmental Quality air quality officials to reduce emissions from prescribed burns and wildfires 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, in proposed forest treatments, by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS and ROD are released, please send one CD copy to this office (specify Mail Code ENF-4-2). If you have any questions, please contact me at 415-972-3521, 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).