Data Submitted (UTC 11): 8/18/2021 7:00:00 AM
First name: Caitlin
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Organization: US EPA Region 10
Title: Physical Scientist
Comments: EPA letter attached.

August 18, 2021

Hilary Krieger, NEPA Planner Middle Fork Ranger District 46375 Highway 58

Westfir, Oregon 97492 Dear Hilary Krieger:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service[rsquo]s Draft Environmental Impact Statement for the Youngs Rock Rigdon project in the Middle Fork Ranger District, Willamette National Forest in Lane County, Oregon (CEQ Number: 20210087; EPA Region 10 Project Number:

19-0037-AFS). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. EPA previously provided scoping comments to the USFS in June 2019.

The Draft EIS analyzes the potential environmental impacts associated with activities to improve stand and landscape diversity, structure, and resiliency; strategically reduce hazardous fuels; sustainably manage the existing trail systems and dispersed recreation while minimizing impacts to natural resources; identify a sustainable road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System Lands; and provide a sustainable supply of forest products. The proposed project area is about 33,000 acres in size. For analysis of impacts from the project, the Forest Service considered a no action alternative and two action alternatives, both proposing about 6,500 acres of treatment. The Draft EIS identifies Alternative 2 as the agency[rsquo]s Proposed Action and Preferred Alternative.

EPA appreciates that the analysis included in the Draft EIS addresses many of the issues we raised during the project scoping period in June 2019. EPA has additional recommendations for the Forest Service to address in the Final EIS in the enclosed detailed comments.

Thank you for the opportunity to provide these Draft EIS comments. If you would like to discuss these comments, please contact Caitlin Roesler at 206-553-6518 or roesler.caitlin@epa.gov, or me at 206-553- 1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu

Digitally signed by Rebecca

Chu

Date: 2021.08.18 12:33:08

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Rebecca Chu, Chief

Policy and Environmental Review Branch

Enclosure

U.S. EPA Detailed Comments on the Draft EIS for the Youngs Rock Rigdon Project, Willamette National Forest, Oregon

August 2021

Air Quality

The Forest Service proposes to conduct prescribed burns (e.g., underburning, pile burning) as part of the post-harvest fuels treatments in the project area. EPA recognizes that while prescribed burning is a valuable tool that can have ecological benefits over other treatment techniques, it has the potential to cause periodic degradation of air quality. To demonstrate how burn decisions will follow Clean Air Act requirements to protect air quality, EPA recommends the following for the Final EIS:

[middot] Commit to working with the Oregon Department of Forestry (ODF) and the Oregon Department of Environmental Quality (ODEQ) to develop burn plans. We note that EPA[rsquo]s final approval of the Oregon Smoke Management Program (SMP) was published in the Federal Register on May 25, 2021.1 The purpose of the Oregon SMP is to minimize smoke impacts from forestland prescribed burning and to provide maximum opportunity for essential forestland burning. ODF and ODEQ worked collaboratively with EPA and stakeholders to improve the Oregon SMP, which includes additional considerations for smoke in sensitive receptor areas and areas traditionally known to be impacted by smoke from prescribed fire.

[middot] Provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, criteria pollutant nonattainment and maintenance areas, and potential air quality impacts of the proposed action (including reasonably certain long-term and secondary effects). Special consideration should be taken regarding the potential impacts of burning activities for fuels control and the impact of smoke to proximate communities, especially those with Environmental Justice concerns which can be identified using EPA[rsquo]s Environmental Justice Screening and Mapping Tool (EJSCREEN)2.

[middot] Include air quality in the mitigation section (Draft EIS Section 2.7) to reduce emissions and ensure compliance with state and federal air quality regulations. Incorporate air quality monitoring within the project area that would be required under the smoke management program into the mitigation strategies for this project, and plan to take corrective action if the NAAQS are not met.

[middot] In addition to evaluating air quality impacts from prescribed burning, the Forest Service should also evaluate impacts from other project activities needing heavy construction equipment (e.g., road activities, harvest, helicopter yarding).

[middot] We advise you that in July 2021, EPA and the Forest Service released improved online mapping tools3 to equip the public with information and resources on wildfire smoke. These online mapping tools display information from ground-level air quality monitors measuring fine particles from smoke and other sources, as well as information on fires and smoke plume locations. Based on this new and relevant information, we recommend the Final EIS disclose potential air quality impacts from the proposed prescribed burns for transparency and to support the integrity of this new tool. The smoke management program for the proposed project should include several elements, such as:

o Methods for minimizing air pollutant emissions during prescribed burning activities

o Outlining smoke management considerations for each burn, such as burning only during favorable weather conditions to minimize smoke intrusions

1https://www.federalregister.gov/documents/2021/05/25/2021-11038/air-plan-approval-or-smoke-management-revision

2https://www.epa.gov/ejscreen

3https://www.epa.gov/newsreleases/epa-forest-service-release-improved-tools-equip-public-information-and-resources

o Plans to notify the public and reduce exposure should smoke intrusions occur

o Public education and awareness programs

o Surveillance and enforcement procedures for ensuring that smoke management programs are effective

o Procedures for periodically evaluating smoke management programs

Water Quality

The Draft EIS explains that project activities are expected to have both negative and beneficial impacts to water quality and aquatic resources. We note with appreciation the direct benefits of the project activities (e.g., restoration treatments) and that various design features and best management practices will minimize the negative impacts. EPA recommends the following for inclusion the Final EIS:

[middot] Discuss how the Forest Service will work with ODEQ to comply with water quality restoration plans, meet water quality standards, and implement existing TMDLs in the project area and vicinity.

[middot] Provide information that demonstrates how water quality would be maintained or improved in streams that are currently meeting water quality standards in accordance with the State of Oregon[rsquo]s antidegradation policies, which [ldquo]protect water from further degradation from new or increased sources of pollution and protects, maintains, and enhances surface water quality to protect existing beneficial uses[rdquo]4.

[middot] Clarify riparian buffer information in Section 2.6, Project Design Features Common to Alternatives 2 and 3 (Draft EIS page 59). AQU1 lists riparian buffer distances as [ldquo]Class 1 streams: 120 feet, Class 2 streams: 75 feet, Class 3: 60 feet, Class 4: 30 feet[rdquo] and AQU2 lists riparian buffer distances as [ldquo]Class 1 streams: 120 feet, Class 2 streams: 100 feet, Class 3: 60 feet, Class 4: 30 feet.[rdquo] Stream classes are defined on Draft EIS page 313 as follows: [ldquo]Stream Classes - Class 1 and 2 = perennial fish bearing streams; Class 3 = perennial non-fish bearing streams; Class 4 = intermittent, seasonally flowing streams[rdquo].

o Include a description of how the Forest Service determined the riparian buffer distances.

o Explain the difference between Class 1 and Class 2 streams, which have different buffer distances and different management goals.

o Explain the determination behind two different buffer targets for Class 2 streams (100 feet and 75 feet) in design features AQU1 and AQU2, while the other stream classes are the same between the two design features.

[middot] Consider tree heights when thinning in areas with smaller buffers (i.e., Class 3 and 4 streams). Stand openings due to thinning harvest can result in lower shadow density produced by the thinned stand, which subsequently result in lower stream shade conditions. Less shady stream conditions have been shown to lead to increasing stream temperatures. Application of proposed buffer treatments along Class 3 and Class 4 streams are more likely to result in increased stream shade reductions from both the narrowing of the inner [ldquo]no harvest[rdquo] buffer, as well as thinning within the outer zone. It is important to consider the height of the vegetation being thinned within the outer zone because taller trees will cast longer shadows than shorter trees and therefore removing taller trees within the outer buffer will have a higher likelihood to be more important for stream shade conditions. Conversely, thinning shorter vegetation (i.e., thinning form below) within the outer buffer zone is much less likely to have an impact on stream shade conditions, and subsequently on less likely to have an impact on stream temperatures.

4https://www.oregon.gov/deq/wq/Pages/WQ-Standards-Antidegradation.aspx

* Discuss the cumulative impacts to the area downstream of the project area and include monitoring to determine if the riparian buffers are effective and maintain [ldquo]unharvested[rdquo] temperatures.

Roads

The Draft EIS indicates that proposed activities will include temporary road construction, system road maintenance, storage, and decommissioning. EPA supports the Forest Service[rsquo]s goal of a more sustainable road system achieved by reducing the miles of road that require maintenance and reconstruction. EPA recommends the following be included in the Final EIS:

* Detail the potential impacts, and associated mitigation, from quarry development that will occur to support road work. Discuss how the Forest Service will work with the Oregon Department of Geology and Mineral Industries to ensure that the quarries will be appropriately reclaimed per state standards.
* Address impacts associated with the new 15-acre rock waste area for placement of excess material generated from road activities, including distances from waterbodies for these areas.

Climate Change

EPA recommends that the Final EIS include a discussion of the effect of changes in climate on the proposed harvest and road work. If projected changes in climate (e.g., increased precipitation events) could exacerbate environmental impacts of the project, consider likely changes as part of the NEPA analysis. We recommend that the Forest Service prepare mitigation techniques should there be a mass failure for which the no-cut riparian area cannot provide effective filtering of sediment before it reaches a waterbody.

Cultural Resources

EPA appreciates the Forest Service initiating government-to-government consultation with Tribal Governments per Executive Order 13175, as outlined in Draft EIS Section 1.5. The Draft EIS states on page 253 that a [ldquo]formal SHPO [State Historic Preservation Office] report is being submitted for concurrence and review which documents the results of the inventory and provides the basis for a Determination of Effect and recommendations for the management of cultural resources within the proposed project area.[rdquo] EPA recommends that the results of these consultations and the results of the report are included in the Final EIS.

Monitoring and Adaptive Management

EPA supports the monitoring outlined in Draft EIS Section 2.7. We further encourage the Forest Service to use monitoring information to adjust management, if necessary, to meet environmental objectives throughout the project lifespan. We recommend that the Final EIS:

* Describe how the monitoring program will be used as a feedback mechanism for adaptive management.
* Disclose lessons learned from past practices in developing similar projects, combined with the need to account for new challenges, such as climate change, to help inform the design and management of the currently proposed project.
* Include any new information from recently available data sources.