



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 4, 2009

Michael R. Williams
Forest Supervisor
Kaibab National Forest
800 S. 6th Street
Williams, AZ 86046

Subject: Final Environmental Impact Statement for the Warm Fire Recovery Project,
Coconino County, Arizona (CEQ #20090089)

Dear Mr. Williams:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Forest Service on April 14, 2008. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) based on concerns about impacts to water resources and wildlife habitat. We recommended selection of Alternative 3, which would restrict ground-based skidding operations to over-snow or frozen soil conditions on areas classified as “severe erosion hazard,” and therefore minimize potential erosion impacts.

The Forest Service has chosen Alternative 2 for the proposed action, which does not include the restrictions on “severe erosion hazard” areas. We continue to recommend selection of Alternative 3 because winter over-snow salvage harvesting would significantly reduce the projected erosion rates and potential effects on soil and water resources. However, if Alternative 2 is implemented, we recommend the following measures be implemented to minimize potential impacts:

- Maximize winter over-snow salvage harvesting in “severe erosion hazard” areas;
- Avoid opening and using roads located in stream buffer zones;
- Ensure that closure of opened roads is performed in a timely manner after salvage is completed and that appropriate barriers are placed to prevent unauthorized use after closure;
- Restrict livestock grazing for more than two growing seasons if necessary to prevent adverse impacts to soil and water quality; and

- Restrict recreation in the recovery area if necessary to encourage habitat restoration.

EPA supports Forest Service efforts to encourage recovery of the forest ecosystem. We recognize that the project includes a variety of measures to reduce impacts to resources, such as restriction of salvage harvest to gentle slopes, no new road construction, limiting ground-based activities to old skid trails and landings, and the commitment to providing sufficient coarse woody debris to increase much-needed ground cover.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact Carolyn Mulvihill of my staff at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

/s/ Connell Dunning

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)