



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

October 12, 2005

Mr. Mike Hannemann
Morman Lake Ranger District
4373 Lake Mary Rd.
Flagstaff, AZ 86001-1147

Subject: Final Environmental Impact Statement for Pickett Lake and Padre Canyon
Allotments, Mormon Lake Ranger District, Coconino National Forest, Coconino
County, Arizona (CEQ # 20050372)

Dear Mr. Hannemann:

The 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 U.S. Forest Service (USFS) on June 16, 2005. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) because of potential concerns regarding impaired meadow and grassland soils, and requested the Final EIS (FEIS) identify the location of these impaired soils. We also recommended, for the benefit of pronghorn fawning, that additional wetland fencing occur as part of this action for those areas where wetland vegetation is most affected by grazing, instead of deferred under an adaptive management option.

We appreciate the inclusion of the Terrestrial Ecosystem Survey (TES) Soil Units map in the FEIS. This map identifies those pastures where the 6,014 acres of impaired meadow and grassland soils are located. In our comments on the DEIS, we also requested the locations of the water quality monitoring sites that showed concern for soil movement. The USFS responded that the State of Arizona administers and publishes water quality sampling information. Regardless of what party conducts the monitoring, it is appropriate to include the information in this EIS, as this water quality data assists in the evaluation of environmental impacts and sound decision-making.

A review of the TES map shows that the Breezy pasture almost entirely lies within TES 453, identified as unsatisfactory and impaired meadow and grassland soils. Large portions of Ducknest and Boot pastures also contain impaired soils (TES 453). The Record of Decision (ROD) identified grazing practices to help protect soil and water quality to include: "grazing at a

level that will maintain enough cover to protect the soils and maintain or improve the quantity and quality of desired vegetation” (p. 10). It is not clear how this will be accomplished in areas with existing impaired soils. In our comments, we recommended additional mitigation for soil impaired areas, such as a reduced percent utilization. We continue to recommend that this be identified as a possible mitigation response, should monitoring activities indicate soils are not being protected.

In our comments on the DEIS, we also recommended that Boot and Breezy pasture seasonal wetlands be fenced as part of the proposed action instead of under an adaptive management option, to prevent these wetlands from being grazed after July 15th for the benefit of pronghorn fawning. The USFS response to this comment referenced the prohibition on grazing these pastures *before* July 15th, for the benefit of the waterfowl nesting season, and did not respond to our concerns regarding impacts to wetlands vegetation and pronghorn fawning.

We appreciate the opportunity to review this FEIS and note our continuing concerns regarding existing impaired soils and wetlands vegetation as it relates to successful pronghorn fawning. If you have any questions, please contact me or Karen Vitulano, the lead reviewer for this project. Karen can be reached at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/S/

Nova Blazej, Acting Manager
Environmental Review Office
Communities and Ecosystems Division