



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

April 2, 2004

Sarah Craighead
Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85730

Subject: Saguaro National Park Fire Management Plan Draft Environmental Impact Statement (DEIS), Arizona [CEQ # 040070]

Dear Ms. Craighead:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as EC-2 -- Environmental Concerns-Insufficient Information (see the enclosed "Summary of EPA Rating Definitions"). Our concerns primarily regard the need for specific measures in the proposal and alternatives that would be used to minimize and mitigate project impacts to soils, water resources, sensitive species, and habitats. We recommend that the final environmental impact statement (FEIS) describe and discuss these measures vis-a-vis the alternatives so that the proposal and alternatives can be effectively evaluated.

We appreciate the opportunity to review this DEIS and request a copy of the FEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/S/
Lisa B. Hanf, Manager
Federal Activities Office

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Enclosures

Mitigation Measures

1. According to the DEIS (p. 2), fire management plans are fundamental strategic documents that guide the full range of fire management related activities. These activities should include measures to avoid, minimize, and mitigate potential impacts to resources. However, for several resources, the DEIS does not describe or evaluate specific mitigation measures. For example, the DEIS (p. 37) states that impacts to soils would be minimized by using the best available technology and rehabilitation of disturbed soils, as determined by the park fire and resource management staff; however, no details are provided. The DEIS also states that mitigation measures will be implemented to avoid impacts to ephemeral drainages, riparian vegetation, *tinajas*, springs, and wet meadows within the park, but it does not describe or discuss these measures. Page 119 states that adverse impacts to watersheds, soils, and water quality/quantity resources will be reduced using site-specific fire implementation plans (FIPs) that would provide guidance on how to best avoid these adverse impacts in the park.

Recommendation: We recognize that individual site-specific FIPs may contain different mitigation measures, based on different approaches to fire management of various sites. However, the FEIS should provide clear descriptions and evaluations of the mitigation measures that would be implemented in these situations and included in the site-specific FIPs. According to the Council on Environmental Quality, the mitigation measures discussed in an EIS must cover the range of impacts of the proposal. (Memorandum for Federal NEPA Liaisons, Federal, State and Local Officials and Other Persons Involved in the NEPA Process, "Forty Questions," 3/16/81). The FEIS should include discussions of how resources such as drainages, riparian vegetation, *tinajas*, springs and wet meadows will be delineated for avoidance in the field during fire management activities; how soil and watershed resources will be protected; and measures that will be taken to avoid adverse impacts to sensitive species.

2. The DEIS (p. 57) indicates that a biological assessment will be included as an appendix in the FEIS. We also understand that you intend to include the biological opinion in the FEIS.

Recommendation: The mitigation discussions in the FEIS should incorporate all requirements from the biological opinion and indicate how these will be carried through to the site-specific FIPs.

Specific Comments

1. The DEIS states that wetlands and floodplains were dismissed from analysis in this document because no wetlands or 100-year or 500-year floodplains occur within the park (p. 19). Elsewhere, however, the DEIS (p. 114) indicates that ephemeral drainages, riparian vegetation, *tinajas*, springs, and wet meadows are located within the park.

Recommendation: The FEIS should rectify these statements.

2. The DEIS is difficult to read because it was printed in all bold, upper case letters.

Recommendation: We suggest that the FEIS be printed using lower case letters for better readability.