



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**75 Hawthorne Street
San Francisco, CA 94105**

September 13, 2004

Woody Smeck, Superintendent
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Subject: Santa Monica Mountains National Recreation Area Fire Management Plan Draft
Environmental Impact Statement (DEIS) [CEQ #040268]

Dear Mr. Smeck:

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 enclosed "Summary of Rating Definitions"). We agree with the National Park Service that fire management is extremely important in the Santa Monica Mountains National Recreation Area (SMMNRA), especially because of its proximity to and wildland/urban interface with densely populated areas of Los Angeles and Ventura counties. We are concerned, however, that the prescribed burn treatments included in the proposed alternative may result in more adverse air quality impacts than using only mechanical treatment to meet the same needs. We recommend that the Final Environmental Impact Statement (FEIS) analyze an alternative that would achieve ecological and strategic fuels treatment via mechanical means rather than through prescribed burning. The FEIS should also analyze air quality impacts for criteria pollutants other than PM10 (particulates smaller than ten microns). Our detailed comments are enclosed.

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

003923

Enclosure

cc: Ventura County Air Pollution Control District
South Coast Air Quality Management District

Alternatives

1. Alternative 2, the proposed alternative, includes wildfire suppression, mechanical fuel reduction, ecological prescribed fire, and strategic fuels treatment. Alternative 3 does not include strategic fuels treatment, and Alternative 4 includes neither strategic fuels treatment nor ecological prescribed fire. According to the DEIS (p. 2-18), strategic fuels treatment and ecological prescribed fire provide potential additional ecological benefits, making Alternative 2 the environmentally preferred alternative. However, the DEIS does not support this conclusion with detailed analyses. The additional ecological and strategic benefits from prescribed burn treatments in Alternative 2 have not been explicitly identified or described in the DEIS. For most resources, the DEIS concludes that the costs and benefits of prescribed burn treatments of Alternative 2 are unknown and will need to be evaluated with project-specific environmental assessments (EAs). Furthermore, of the four alternatives analyzed in detail, Alternative 4 minimizes air quality impacts.

The Santa Monica Mountains National Recreation Area (SMMNRA) is located within Los Angeles and Ventura counties. Los Angeles County is a federal non-attainment area for PM10 (particulates smaller than ten microns), ozone, and carbon monoxide. Ventura County is a non-attainment area for ozone. In light of the air quality in the SMMNRA, EPA encourages the use of mechanical treatment to the extent possible to minimize air quality impacts from smoke. Region 9 EPA relies on California's Smoke Management Program regulated by the State's *Smoke Management Guidelines for Agricultural and Prescribed Burning* to ensure uses of alternatives to burning where feasible. The DEIS does not evaluate in detail an alternative that would achieve, via mechanical treatment, the ecological and strategic benefits that the National Park Service (NPS) hopes to achieve by implementing the prescribed burn treatments of Alternative 2.

Recommendation: The FEIS should provide a detailed analysis of an alternative that would substitute mechanical treatment for the proposed prescribed burn treatments of Alternative 2. The FEIS should address whether the mechanical treatments could be used to accomplish the same goals as the strategic fuels treatment and ecological prescribed fire treatment under Alternative 2, and discuss the environmental impacts and benefits of this alternative in comparison with the other alternatives. The FEIS should also identify additional mitigation measures that could be used with Alternatives 2 and 3 to minimize smoke emissions. Such measures could include physically reducing fuels (removal of small brush) and/or concentrating fuels into piles before burning to promote shorter, hotter burns.

2. Alternative 6 would provide mechanical treatment on a "landscape level." It is unclear, however, whether the prescribed burning treatments of Alternative 2 would be replaced by

Santa Monica Mountains National Recreation Area Fire Management Plan DEIS
EPA Comments – September, 2004

mechanical treatments under Alternative 6, or whether Alternative 6 represents a much larger-scale mechanical treatment. This alternative was eliminated from detailed analysis in the DEIS because it is inconsistent with NPS policies and guidelines and the objectives of the SMMNRA fire management program (DEIS, p. 2-18). The DEIS does not describe the inconsistencies with either the NPS policies and guidelines or the SMMNRA fire management program. Furthermore, we understand that the purpose for this EIS is to develop a new SMMNRA fire management program. Therefore, it is unclear how an alternative could be inconsistent with a program that has not yet been developed.

Recommendation: The FEIS should identify and describe the components of Alternative 6 in greater detail and clarify whether it is consistent with NPS policies and guidelines.

Air Pollutant Emissions

The DEIS uses PM10 emissions projections “as a proxy for other air pollutants for the purposes of analyzing the relative air quality impacts of the different alternatives.”(p. 4-48) The DEIS does not provide emissions projections for other criteria pollutants associated with wildland and prescribed fire or emissions projections from mechanical treatments. PM10 emissions projections cannot be used to determine projections for these other pollutants, which must be determined on a pollutant-specific basis. Estimated emissions of carbon monoxide and nitrogen oxides (NOx) are particularly important to the air analysis because of the SMMNRA’s location within non-attainment areas for carbon monoxide and/or ozone. Furthermore, PM2.5 emissions estimates are important because, although EPA has not yet finalized designations of PM2.5 non-attainment areas, the State of California has recommended Los Angeles County as a federal non-attainment area for this pollutant. EPA intends to finalize its designations of PM2.5 non-attainment areas by the end of this year.

Recommendation: The FEIS should provide the projected emissions of PM2.5, carbon monoxide, and NOx for each alternative; describe their impacts on the Ventura and Los Angeles County non-attainment areas; and discuss how the alternatives would conform with the appropriate State Implementation Plans.