



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

August 23, 2004

Jack Blackwell
Regional Forester
Pacific Southwest Region
US Forest Service
1323 Club Drive
Vallejo, CA 94592

Subject: Draft Environmental Impact Statement for Southern California
Forest Plan Revisions: Angeles, San Bernardino, Cleveland, and
Los Padres National Forests (CEQ # 040217)

Dear Mr. Blackwell:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced draft environmental impact statement (DEIS) 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. Our detailed comments are enclosed.

EPA recognizes the significant challenges confronting the Southern California National Forests caused by increasing urbanization, severe drought and insect damage, high fire hazard, and ever-expanding diverse, and, at times, conflicting forest use demands. We commend the new planning format that integrates an over-arching vision, design criteria and legal framework, and forest-specific strategies linked to national goals. Of special note are the forest-specific strategies and their characterization of geographic units' program focuses and desired conditions.

The identified preferred alternatives are Alternative 2 for the Cleveland National Forest, and Alternative 4 for the Angeles, Los Padres, and San Bernardino National Forests. Alternative 2 focuses on maintaining biological diversity and ecological integrity while providing a gradual increase in recreation opportunities through reconstruction of degraded facilities, construction of new facilities to accommodate increasing demand, more intensive user controls, and avoidance and minimization of effects to species-at-risk. Alternative 4 has an increased emphasis on recreation with intensive levels of management controls and measures to offset the effects on biological diversity and ecological integrity of the forest.

EPA concerns include avoidable impacts to sensitive resources, water quality and quantity, and air quality; integration of fire use as a management tool; and the feasibility and sources of adequate management and monitoring funding. While we understand the above alternatives provide management flexibility, multiple use benefits, and continue motorized access in many locations for fire suppression, community protection, and forest health projects;

we are concerned with the ability of the preferred alternatives to minimize environmental impacts and expeditiously move the forests toward stated desired conditions.

We have rated the preferred alternatives (Alternatives 2 and 4) as Environmental Concerns - Insufficient Information (EC-2). Please see the enclosed Rating Factors for a description of EPA's rating system.

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CMD-2). If you have any questions, please contact me or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/S/

Lisa B. Hanf, Manager
Federal Activities Office
Cross Media Division

Enclosures:

Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: Ron Pugh, Program Leader, Cleveland National Forest
USDA Forest Service Content Analysis Center
Forest Supervisor, Los Padres National Forest

Alternatives

1. Alternative 4 would have the next to largest level of disturbance to soils (20 percent increase in activity) (pg. 2-13), focus on improving roads for public access rather than wildfire engine safety (pg. 3-242), and rely on greater Forest Service presence and user restrictions to maintain sustainable recreational uses (pg. 3-143). For these reasons, and the history of flat to reducing budgets (Forest-Specific Strategies), we are concerned with the ability of this alternative to minimize environmental impacts and expeditiously move the forests toward stated desired conditions.

Recommendation:

We recommend the Forest Service consider modifications to Alternative 4 to reduce the level of soil disturbance and more aggressively address the deterioration of all roads, including maintenance level 3 and 4 roads needed to ensure wildfire engine safety. Addressing the road maintenance backlog is essential in meeting fire suppression, healthy forest, community protection, and water quality objectives.

2. Alternative 4 is also less protective of unique resources such as grabbo outcrops and pebble plain because it does not ensure protection of all identified candidate research natural areas (RNAs) (pg. 3-49, 3-52). The draft environmental impact statement (DEIS) clearly states that failure to establish identified candidate research natural areas during the planning period will perpetuate substantial gaps in the RNA target element system, a major goal of the RNA program. Furthermore, these areas are of great value as control areas against which to compare effects of management activities, a key requirement when relying on adaptive management.

Recommendation:

We recommend Alternative 4 be modified to fully protect unique and sensitive habitats by designating all identified candidate research natural areas.

3. While Alternative 2 would focus more on maintaining biological and ecological integrity, the DEIS states that it would be slightly less protective of watersheds than Alternative 4 which focuses on recreational development (pgs. 2-13).

Recommendation:

The final environmental impact statement (FEIS) should provide more information on why Alternative 4 provides more protection for watersheds than Alternative 2. For example, does Alternative 4 provide more watershed protection because it includes more restoration projects, relocates heavy recreational use away from sensitive riparian areas, or more aggressively addresses recreational impacts with mitigation?

Water Supply

1. The DEIS clearly identifies the key role National Forest system lands have in contributing to and maintaining the southern California water supply (pgs. 3-124 to 3-144). These forests were originally established as “watershed forests” (pg. 3-127). Community drinking water supplies are wholly or partially provided in 44 watersheds on the forests. An increasing management challenge is balancing the maintenance of water for forest resource needs and extraction of water for human needs, especially since the Forest Service has little control over water extractions outside Forest Service boundaries (pg. 3-145). An emerging issue is pumping outside Forest Service boundaries or within in-holdings which could be extracting groundwater from underneath Forest Service lands (pg. 3-127).

Recommendations:

As stewards of the headwaters for primary water supply sources for southern California, we urge the Forest Service to more actively prevent causes of watershed degradation by protecting remaining high quality areas, preventing further degradation, and restoring ecological conditions and functions. While we understand that Alternative 6 provides this focus, we also recognize the need for the Forest Service to address other resource and multi-use demands. We recommend the Forest Service consider incorporating watershed components of Alternative 6 in Alternatives 2 and 4.

The FEIS should include a section describing management activities to preserve and enhance the Forests' ability to protect watersheds that provide critical water supply sources. For instance, list in the Forest-Specific Strategies whether actions will be taken to preserve water rights, relocate roads and recreational activities to remove hazardous waste and sediment inputs to water supply streams, and restore key water supply watersheds.

The Forest Service should also continue to participate in public forums and dialogues regarding southern California water policy, development, and use. A Forest Service presence is helpful in efforts to improve water quality and quantity in water supply headwaters, groundwater management, water development in or near Forest Service lands, and water transfer programs.

Fire Management

1. Catastrophic wildfires over the last 10 years, such as the fires of October 2003, have highlighted the urgent need to address fire and fuels management in the National Forests. The 2001 Federal Fire Policy underscores the need for Fire Management Plans that identify and integrate all fire management and related activities within the context of approved land management plans. Guiding principles state the role of wildland fire as an essential ecological process and natural change agent that will be incorporated into the planning process. The 2001 Federal Fire Policy also emphasizes the need to more effectively and directly integrate fire management activities with other natural resource goals. Thus, Land and Resources Management

Plans (LRMPs) and Fire Management Plans should appropriately incorporate activities that contribute to ecosystem sustainability.¹

Recommendation:

The FEIS should describe the status of each Forests' Fire Management Plan and describe how they will be updated once the Forest plan revisions are approved. Specifically describe how the plan revisions integrate fire as a critical natural process.

2. Preferred Alternatives 2 and 4 emphasize a suppression strategy that mitigates increased human caused ignitions with aggressive fire suppression and strategically located vegetation treatments in chaparral and fire prone vegetation types (pg. 3-47). In partnership with the Interagency Air and Smoke Council, EPA and other Federal Agencies have developed the Wildland Fire Use Management Protocol (Protocol). The Protocol provides guidance on when and how to use wildland fires to meet management and resource needs. We understand the southern California forests will not be using this Protocol due to the significant risk of wildland fires placing communities at risk.

Recommendation:

Given the high costs of fire suppression and vegetation treatments, and the Federal Fire Policy emphasis on integrating fire into management, the FEIS should address the feasibility of a fire-use strategy to meet management and resource needs. We recommend the preferred alternatives increase their focus on fire suppression and treatments within the wildland-urban interface (WUI) and fire-use in more remote areas.

Monitoring

1. The preferred alternatives include an adaptive management approach to ensure achievement of stated goals, objectives, and desired conditions. Annual monitoring and extensive monitoring every 5 years is proposed (Part 1 National Forests Vision). The DEIS does not provide detailed monitoring plans or information on funding for this work.

Recommendation:

The FEIS should provide example monitoring plans and more specific information regarding who will fund and implement monitoring procedures. If feasible, include information on the reliability and sources of funding for monitoring.

¹Review and Update of the 1995 Federal Wildland Fire Management Policy, Chapter 2, pgs. 19-25 (2001 Federal Fire Policy).

Mitigation

1. The DEIS describes direct, indirect, and cumulative impacts to vegetation resources, forest health, biodiversity, invasive nonnative species, watersheds, soils, airsheds, and geological resources. However, the DEIS does not appear to address in detail mitigation for these impacts.

Recommendation:

The FEIS should provide a short chapter on mitigation, listing potential mitigation measures that could improve the project, even if they are outside the jurisdiction of the Forest Service [40 CFR Section 1502.16(h); 40 Questions and Answers About the NEPA Regulations, CEQ Memorandum March 16, 1981].

Los Padres National Forest

1. The DEIS states that restrictions placed on lands available for oil and gas development on the Los Padres National Forest would be based on the pending Record of Decision for the Los Padres National Forest Oil and Gas EIS (pg. 3-145). EPA's review of the Los Padres National Forest Oil and Gas DEIS identified significant air quality impacts that should be avoided or minimized to provide adequate protection for the environment. We assigned a rating of Environmental Objections - Insufficient Information (EO-2) to the preferred alternative for the Oil and Gas DEIS and requested the Forest Service retain its ability to request additional mitigation measures or deny subsequent development in situations where development would adversely affect sensitive forest resources (EPA letter to Jeannie Derby, Forest Supervisor, Los Padres National Forest, April 19, 2002).

Recommendation:

The FEIS should include a short description of the preferred alternative of the Los Padres National Forest Oil and Gas EIS.

General Comments

1. Part 1 National Forests Vision states that "a plan by itself is not an action-forcing document and therefore is not a major federal action having a significant effect on the quality of the human environment" (pg. Introduction-4). This statement raises the question of whether such a plan triggers National Environmental Policy Act (NEPA) requirements which are initiated to evaluate the potential environmental consequences of a major federal action. We recognize that the southern California Forest Supervisors elected to complete the plan revisions using the 1982 Planning Rule (pg. 1-5) which requires an EIS.

EPA strongly supports NEPA evaluation at the land management planning level. Forest Plans set land allocations, standards and guidelines for managing the different allocations, overall grazing and logging levels, identifies lands suitable for timber production, and considers cumulative effects. Plans, therefore, can significantly affect on-the-ground effects from project-

level actions. The National Forest Management Act, Forest Plans, and NEPA analysis of these plans have been central to balanced consideration of appropriate land uses on the nation's National Forests. NEPA evaluation at the plan revision level provides a forum to substantively engage in a public dialogue on water quality, air quality, land use allocations, cumulative effects and ecological issues.

Recommendation:

The FEIS should clarify the intent of the above statement in Part 1 National Forests Vision. We request the Forest Service clarify existing policy regarding application of NEPA to future land management plan amendments.

2. The Forest-Specific Strategies describe ambitious programs for implementing national and forest-specific goals and objectives to move the forests towards desired conditions. While these plans are commendable, the level of work described appears greater than can be achieved given historical funding levels.

Recommendation:

We recommend the Forest Service continue to explore ways to collaborate with other agencies and the surrounding communities to meet management and ecosystem needs. The FEIS should include a short section describing how communities, industry, and the interested public can participate more actively with the Forest Service in achieving common resource and management goals. For instance, list forest-specific Federal advisory committees (FACA groups), joint private/public projects, community wildfire protection planning efforts, and fire safe councils with contact information.

3. In southern California the National Forests are considered core areas for the maintenance of biological diversity (pg. 3-98). Although all alternatives include direction to maintain biodiversity, Forest Service lands are managed for multiple uses. EPA provided comments on the 2003 Western Riverside County Multiple Species Habitat Conservation Plan DEIS (Riverside MSHCP), expressing concern with the reliance on Public/Quasi-Public lands to provide the backbone of the proposed Conservation Area. We expressed concerns with reliance upon surrounding National Forest Service lands which serve multiple uses that can conflict with preservation and conservation of sensitive species and habitats.

Recommendation:

Where applicable, the Forest-Specific Strategies should fully disclose their management intent and ability to provide preservation and conservation coverage for biodiversity and threatened and endangered species as required by the Western Riverside MSHCP.