

Krueger, Elizabeth -FS

From: Davy, Anne - FS
Sent: Tuesday, October 31, 2017 7:20 AM
To: Honors, Kelly -FS; Krueger, Elizabeth -FS
Subject: FW: EPA Comments on Black Hills RLP
Attachments: BlackHillsRLP_DEIS_EPA_Comments_10-30-2017.pdf

On time



Anne Davy
Project Manager
Forest Service
Washington Office, BusOps, Enterprise
406-273-1836

From: McCoy, Melissa [mailto:mccoy.melissa@epa.gov]
Sent: Monday, October 30, 2017 6:15 PM
To: Davy, Anne - FS <adavy@fs.fed.us>
Subject: EPA Comments on Black Hills RLP

Dear Ms. Davy,

The EPA Region 8 has reviewed the Forest Service's Black Hills Resilient Landscapes Project Draft Environmental Impact Statement. Please see attached our comments, and please feel free to contact me with any questions or concerns.

Sincerely,

Melissa W. McCoy, Ph.D.
NEPA Compliance and Review Program
U.S. EPA Region 8 (EPR-N)
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OCT 30 2017

Ref: 8EPR-N

Mark Van Every
Forest Supervisor
Black Hills National Forest
1019 North 5th Street
Custer, SD 57730

Dear Supervisor Every:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's Draft Environmental Impact Statement (EIS) for the Black Hills Resilient Landscapes Project (CEQ No. 20170177)

The Black Hills Resilient Landscapes Project would include silvicultural treatments intended to increase ecosystem resilience to disturbances and achieve Forest Plan objectives and desired conditions for pine structural stages and within-stand diversity, as well as aspen, oak, and grasslands maintenance. Proposed treatments include overstory removal, patch clearcuts and prescribed burns, and would reduce hazard fuel conditions and trees, produce merchantable timber products, and foster forest regeneration.

Based on our review of the Draft EIS, the EPA has rated this document as "LO", Lack of Objections. The LO rating means that the EPA's review has not identified any potential environmental impacts requiring substantive changes to the Proposed Action. A full description of the EPA's rating system can be found at: <http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>.

Our comments focus on adaptive management and opportunities for further clarification. Our detailed recommendations are provided for your consideration in the enclosure. We appreciate the opportunity to review this project and hope our recommendations help the Forest Service when finalizing the EIS. If further explanation of our comments is desired, please contact me at (303) 312-6704, or Melissa McCoy, lead reviewer for this project, at (303) 312-6155 or mccoy.melissa@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. S. Strobel".

Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

EPA's Detailed Comments on the Black Hills Resilient Landscapes Project

(1) Monitoring and Adaptive Management

1 The EPA supports the monitoring activities proposed by the Forest Service to ensure that design features are implemented and effective at protecting watershed resources. In addition to monitoring, we recommend the Forest consider identifying resource condition thresholds in the Final EIS that, if exceeded, would trigger management action such as specific mitigation measures.

(2) Opportunities for Clarification

Water Quality Design Features

2 We support the additional design features that would be implemented under the proposed action, such as special protections for aquatic management zones (AMZs) and limits on road construction in watersheds with impairments or risks to function due to excess total suspended solids. These criteria reduce the potential for impacts to water resources. We note that ephemeral streams would be buffered by an AMZ of 100 feet on each side of the streams for a distance of 500 feet upstream from their intersection with perennial and intermittent streams. We recommend that the Final EIS discuss the basis for limiting the AMZ around ephemeral streams to 500 feet upstream of their confluence with more permanent waters, or explain what management practices are in place to prevent delivery of sediment from areas above the AMZ.

3 The Draft EIS states that Forest Plan standard 1203 requires that stream crossings be constructed to provide for passage of flow and sediment and withstand expected flood flows (p. 164). We recommend that stream crossings also be designed to pass routine woody debris to reduce the risk of culvert washout.

Riparian Areas, Springs, and Wetlands

4, 5 Under the Proposed Action, vegetation removal for up to 43 road crossings of perennial and intermittent streams would occur, and the Draft EIS discloses that associated riparian areas would be affected by this loss of streamside vegetation (p. 164). We recommend that the Final EIS discuss the extent to which this removal of vegetation could affect the functions and values of these aquatic and riparian resources. We also note that the number of potential new road stream crossings listed in Table 29 (20 crossings) is different from the number indicated on p. 165 (15 new crossings and 28 crossings by roads on existing templates). We recommend reconciling these numbers.

Air Quality

6 The largest potential for air quality effects due to the Proposed Action would be from implementing prescribed fire. A description of current conditions is important to serve as a baseline for future effects. In describing baseline air quality, we recommend that available data and trends information at nearby Class I Areas over the past several years be included in the Final EIS. We also recommend identifying, in addition to the Class I Areas of Wind Cave National Park and Badlands National Park, other important or sensitive areas where smoke could affect pollutant concentrations or air quality related

values such as visibility, including Mount Rushmore National Monument and Jewel Cave National Monument.

7 We recommend disclosing the maximum acreage that would be burned simultaneously in the planning area. Based on acreage, fuel loading characteristics and burn practices, the Forest's planning process can be used to avoid regional smoke accumulation.

8 Consider whether there are opportunities to reduce emissions by offering gathered wood as wood product, such as for fiber board, mulch, fiber reinforcement, and soap.

9 We recommend that the Final EIS clarify whether pile burns are subject to the Prescribed Fire Plan, including incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (April 2014 – note updated version). If not, we recommend the Draft EIS describe any potential short-term air quality impacts associated with this treatment type. A good example calculation of PM_{2.5} emissions associated with pile burns can be found in the Black Hills National Forest's Calumet Project Final EIS (see the Fire and Fuels Section, p. 159).

Soil Erosion

10 The Draft EIS describes how soil compaction, erosion, and other disturbances caused by silvicultural activities can have detrimental effects on soil productivity; therefore, there is value in determining the level of risk that may occur with such disturbances so that effective avoidance measures can be implemented. The Draft EIS states that soil survey map units totaling 63% of the project area have a compaction hazard rating of severe for at least one of the dominant soil components, and units totaling 24% of the project areas have a severe or very severe erosion hazard (p.143). While most monitoring of timber harvest and associated activities in the Black Hills has demonstrated non-significant disturbance to soils (p. 142), the Draft EIS identifies that moderate to severe effects have been observed. In order to inform further on the risk of disturbance within the soil units, we recommend that the Final EIS indicate which areas monitored had been rated as severe for compaction, erosion or other hazards, if there were identifiable specific causes for the moderate to severe effects that were observed, and if so, how such causes would be avoided while implementing the Proposed Action. In addition, design feature 6 of the Proposed Action requires soil disturbance assessments to be completed prior to treatment activities when there are specific concerns regarding soils, such as high hazard rating for erosion, compaction or rutting. We recommend that the Final EIS describe how activities would be modified based on the results of the disturbance assessments.

11 The Forest Service proposes to update the Black Hills Forest Plan by replacing standard 1102 with new language found in the Regional Watershed Conservation Practices Handbook. This update would effectively allow whole-tree yarding in additional areas. Page 146 of the Draft EIS states that nutrient cycling on sites considered suitable for timber production would generally remain within Forest Plan limits if standard 1102 is revised, while in wildland-urban interface and areas near critical infrastructure, effects on nutrient cycling could occur. In order to inform the decision regarding this amendment, we recommend that the Final EIS discuss what, if any, changes could occur, especially with regard to soil productivity and erosion, in areas designated for other uses or management emphases, and how such changes could affect those uses.