UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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APR - 4 2016

Ref: 8EPR-N

Matt Janowiak
Columbine District Ranger
San Juan National Forest
P.O. Box 439
Bayfield, CO 81122

Re: Draft Environmental Impact Statement Weminuche Landscape Grazing Analysis, CEQ #20160036

Dear Mr. Janowiak:

The U.S. Environmental Protection Agency Region 8 has reviewed the Draft Environmental Impact Statement (EIS) developed by the U.S. Department of Agriculture Forest Service (USFS). In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the EPA has reviewed and rated this Draft EIS.

Background

The project area, known as the Weminuche Landscape, includes approximately 167,000 acres on six active allotments within the Columbine Ranger District. The project was developed to evaluate options for the continued authorization of term livestock grazing permits on all or portions of the allotments designated for livestock grazing. The proposed action is designed to increase the flexibility of livestock grazing systems through adaptive management, leading to improved soil, watershed, and vegetative conditions and healthier wildlife populations.

Comments and Recommendations

We appreciated the opportunity to provide scoping comments for this project with our March 5, 2015 letter. It appears that the proposed management actions of the Preferred Alternative are supported by the Draft EIS and will assist the USFS in efforts to improve rangeland health conditions and avoid impacts to native bighorn sheep populations. The EPA appreciates the USFS analysis of existing aquatic resources in relation to the Preferred Alternative. The Draft EIS provides important information on fen and wetland habitat, riparian habitat, existing surface water quality, aquatic life, public drinking water connectivity and groundwater resources in the project area.

Based on our review of the Draft EIS, the EPA's remaining comments and recommendations focus on adaptive management and monitoring with the intent of further informing the decision to be made and the public's understanding of potential impacts to public health and the environment. These issues serve as the basis for the EPA's rating discussed at the conclusion of this letter.

Adaptive Management and Monitoring

The Draft EIS describes adaptive management options, monitoring requirements and the necessary trigger points to invoke responsive management actions. We support the USFS's efforts to reduce grazing impacts through the use of monitoring and adaptive management options to protect sensitive soils, waterbodies, wetlands, riparian areas, meadows, stream crossings, drinking water wells, and critical habitat.

The Draft EIS describes monitoring requirements that will be implemented to ensure that resource desired conditions and project objectives are met. The majority of the monitoring and adaptive management involves the use of the U.S. Department of Agriculture's Rangeland Health Evaluation Matrix (RHM) and Proper Functioning Condition (PFC) methodologies. It would be helpful if the Final EIS included a detailed explanation regarding how these methodologies will ensure compliance with project level monitoring requirements for parameters such as water quality.

The Draft EIS notes that state water quality assessments will be utilized to assess water quality conditions in the project area. The EPA agrees that state water quality assessment data will be useful; however, we recommend that the Final EIS expand upon how solely utilizing this information without supplemental monitoring will provide project level information that will be useful for decision making. Additionally, the project proposes that monitoring, including RHM and PFC, and subsequent adaptive management actions will be conducted at least once every 10 years. We recommend that the Final EIS provide greater detail on how a 10 year interval monitoring protocol will provide adequate adaptive management decision-making information for dynamic resources such as surface water, public drinking water, ground water and wetlands. These resources can be drastically altered in a 10 year timeframe. If interim measures are to be performed, we recommend that they are clearly outlined in the Final EIS.

Other Considerations

On page 88, the Draft EIS describes two existing shallow ground water wells used for domestic drinking water in the Burnt Timber grazing allotment campgrounds. The document also describes measures to fence off the campgrounds from cattle (and sheep) to reduce encounters between the grazing animals and recreation. Although not explicitly noted, the EPA presumes that the wells, and their source water assessment and protection areas, would be within the fenced area. If current or future wells or surface water intakes are not fenced from grazing domestic animals, then we recommend that additional measures be considered to protect from possible contamination. While the Colorado Source Water Assessment and Protection Program is identified as a program that will protect drinking water supplies, it is important to note that the protection aspect of the program is voluntary in nature. To maintain the quality of the drinking water wells, the USFS would need to implement protection efforts that could include restricting sheep and cattle activity in areas immediately around the well and within the source water protection area. Further, the Final EIS could include drinking water source water protection program areas in the definition of "areas of concern" (as described on page 56 of the Draft EIS, Design Criteria).

Closing

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the

proposed project, the EPA is rating the Draft EIS Preferred Alternative 4 as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, or discussion that we recommend for inclusion in the Final EIS. A description of the EPA's rating system can be found at: http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria.

We appreciate the opportunity to participate in the review of this project, and are committed to working with you as you prepare the Final EIS. If we may provide further explanation of our comments during this stage of your planning process, please contact me at 303-312-6704, or your staff may contact Matt Hubner at 303-312-6500 or hubner.matt@epa.gov.

Sincerely,

Amelia A. Platt

for

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

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