

US EPA ARCHIVE DOCUMENT



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

August 23, 2012

Ms. Martie Schramm  
District Ranger  
Kaibab National Forest  
Attention: Bill Williams Mountain Restoration Project  
742 South Clover Road  
Williams, Arizona 86046

Subject: Draft Environmental Impact Statement for the Bill Williams Mountain Restoration Project,  
Coconino County, Arizona (CEQ# 20120225)

Dear Ms. Schramm:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Bill Williams Mountain Restoration Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA commends the Forest Service for the commitment demonstrated in the Bill Williams Mountain Restoration Project (Project) to restore and sustainably manage the ponderosa pine and mixed conifer forests on Bill Williams Mountain. We strongly support the restoration goals for this Project, as well as those developed for the broader Four Forest Restoration Initiative, the landscape-scale planning effort to restore 2.4 million acres of forest lands in northern Arizona.

Based on our review of the DEIS, we have rated the preferred alternative and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA recognizes the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. We commend the Forest Service for committing, in the preferred alternative, to strong best management practices and soil and water conservation practices to protect sensitive resources during mechanical harvest and fire treatments. We would also like to acknowledge the thorough description, in the DEIS, of the possible effects of climate change on the Project, and the commitment, through the preferred alternative, to mitigate those effects.

We recognize the challenge the Forest Service faces by implementing a management plan that will rely heavily on prescribed burns and wildfire to achieve restoration objectives. Though the planning area has good air quality, and meets all federal ambient air quality standards, the fine particulate matter generated during wildland fire can present a human health risk. We recommend that the Forest Service implement BMPs and work with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent.

One aspect of the Project that gives us pause is the planned use of cable logging within the Arizona Bugbane Botanical Area. The DEIS states that the disturbance associated with cable logging within the Botanical Area could disrupt the microclimate and may adversely affect the Arizona bugbane population (p. 243). Additionally, the DEIS states that the anticipated disruption of the microclimate, coupled with

projected future warming of the planning area, could contribute to a trend toward federal listing of the species (p. 244). We recommend that the Forest Service refrain from the use of cable logging within the Botanical Area unless mitigation measures could be developed that would ensure long-term protection of the Arizona bugbane population.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. Please note that starting October 1, 2012, EPA Headquarters will not accept paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012, must be made through the EPA's new electronic EIS submittal tool: *e-NEPA*. To begin using *e-NEPA*, you must first register with the EPA's electronic reporting site - [https://cdx.epa.gov/epa\\_home.asp](https://cdx.epa.gov/epa_home.asp). Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

/s/

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Enclosure: Summary of the EPA Rating System