

US EPA ARCHIVE DOCUMENT



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

February 2, 2005

Alan Whalon, Superintendent  
Chiricahua National Monument  
13063 E Bonita Canyon Road  
Willcox, AZ 85643

**Subject:** Draft Environmental Impact Statement (EIS) for the Chiricahua National Monument  
Fire Management Plan [CEQ #040546]

Dear Mr. Whalon:

The U.S. Environmental Protection Agency (EPA) has reviewed the document referenced above. 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 commend the National Park Service and the Coronado National Forest for working together to develop an alternative that manages fire from a watershed perspective and includes a Zone of Cooperation outside of the park in the adjacent National Forest. This alternative appears to afford the two agencies more flexibility and efficiency in managing wildland fires to reduce hazardous fuels. We have concerns regarding impacts to water quality in the project area, however, and recommend additional information be included in the Final EIS regarding water quality, mitigation, and monitoring. Therefore, we have rated this Draft EIS as "EC-2" - Environmental Concerns - Insufficient Information (see enclosed "Summary of Rating Definitions"). Our detailed comments are enclosed.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS 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

Enclosures

cc: Coronado National Forest

### Water Quality

The Draft EIS does not describe surface waters or provide information on the existing water quality within Chiricahua National Monument or the Zone of Cooperation (ZOC) in the adjacent Coronado National Forest. Furthermore, the Draft EIS does not discuss how streams, springs, and wetlands would specifically be affected by the alternatives considered.

**Recommendation:** The Final EIS should identify the beneficial uses, baseline water quality, habitat types, values, and functions for streams, springs, and wetlands within and downstream of the monument and ZOC. The Final EIS should describe in more detail the potential changes to water quality, habitat, values, and functions of these waters by prescribed burns and other treatments under the alternatives.

### Mitigation and Monitoring

In the list of mitigation measures and best management practices that would apply to all alternatives, the Draft EIS (pp. 25-27) identifies a few measures that specifically apply to wetlands. We believe further discussion is needed regarding appropriate measures that would be applied during prescribed burns or wildland fire use to protect water quality and riparian areas to the extent practicable.

**Recommendation:** The Final EIS should discuss in more detail measures that will be used in riparian, spring, and wetland areas under the alternatives considered. For example, will riparian areas, springs, and wetlands be mechanically treated or prescriptively burned? Are riparian buffer zones required? Will there be a minimum setback for fire breaks in these areas? What criteria will be used to determine this? Describe and discuss the adverse and beneficial affects of these measures. We also recommend that the National Park Service conduct water quality monitoring before, during, and after prescribed burns and other treatments to verify that mitigation measures are appropriate and effective.