

US EPA ARCHIVE DOCUMENT

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

June 13, 2005

Brian O'Neill  
General Superintendent  
Golden Gate National Recreation Area  
Building 201, Fort Mason  
San Francisco, CA 94123  
Attention: Fire Management

Subject: Draft Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area Fire Management Plan, San Mateo, San Francisco, and Marin Counties, California (CEQ #050104)

Dear Mr. O'Neill:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document 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. We are aware that comments on the above document were due to the Golden Gate National Recreation Area (GGNRA) on May 27, 2005. Our comments are provided in accordance with the EPA-specific extension to the deadline date from May 27, 2005 to June 13, 2005 granted by Wendy Poinsot, the Project Leader (telephone conversation between Laura Fujii and Wendy Poinsot, May 12, 2005).

EPA recognizes the need for fire management actions on GGNRA lands for fire hazard reduction and resource benefit. The Fire Management Plan will provide the framework for fire management actions for the GGNRA over the next 10-15 years. We commend the commitment to specific mitigation measures as described in Chapter 2 Section 2.7 (pps. 94-110). Of note is the reuse and recycling of mechanically removed wood such as eucalyptus wood into firewood, woody debris in stream restoration projects, and flooring (p. 83).

Based on our review, we have rated the DEIS as Environmental Concerns - Insufficient Information (EC-2). We have concerns regarding smoke management and protection of air quality, water quality, wetlands, and the use of herbicides. Please see the enclosed Detailed Comments for a description of these concerns and our recommendations. A *Summary of EPA Rating Definitions* is enclosed.

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED\_2). If you have 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/

Nova Blazej, Acting Manager  
Environmental Review Office  
Communities and Ecosystems Division

Enclosures:

Summary of EPA Rating Definitions  
EPA's Detailed Comments

cc: Bay Area Air Quality Management District

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)  
FOR THE GOLDEN GATE NATIONAL RECREATION AREA FIRE MANAGEMENT PLAN, JUNE 13,  
2005**

**Air Quality**

1. Alternative C, the National Park Service (NPS) preferred alternative, would allow, annually, a maximum of 275 acres of mechanical fuel treatment and 320 acres subject to prescribed burning (p. 83). This is the greatest number of acres proposed for treatment, over twice the number of acres treated under Alternative A, No Action - 1993 Fire Management Plan. In addition, Golden Gate National Recreation Area (GGNRA) is adjacent to a highly populated region with approximately 38 miles of wildland urban interface (WUI) at risk from fires and smoke generated by fire management activities. The Fire Management Plan (FMP) and Final EIS (FEIS) should highlight measures to manage smoke and address adverse air quality effects.

**Recommendations:**

The Executive Summary should include information on smoke management and protection of air quality. For instance, Table ES-2: Summary of Impacts, Visitor Use and Visitor Experience, should include smoke impacts from prescribed burning such as potential adverse effects to public health, reduced visibility, and smoke irritation.

FMP Goals (pps. iv-v) should include a goal specific to smoke management and protection of air quality. This goal can emphasize the use of a Smoke Management Plan (SMP) to address smoke and air quality issues. Smoke management practices that will be used to protect air quality and public health should be highlighted in the FEIS. An option is to include a separate heading in Chapter 4 - Environmental Consequences for smoke management.

2. The DEIS states: "All prescribed burning at Point Reyes National Seashore (PRNS) and GGNRA would continue to be planned and performed under the auspices of the Bay Area Air Quality Management District (BAAQMD) Smoke Management Program, which in turn is incorporated into the State Implementation Plan (SIP)." (Chapter 4, p. 300). EPA does not have a SIP from BAAQMD that contains a Smoke Management Program.

**Recommendation:**

The FEIS should describe how the Smoke Management Plan relates to the SIP. State GGNRA compliance with State and local air district regulations.

3. Recommendations for reducing exposure of firefighters to carbon monoxide (CO), aldehydes, and particulates while working prescribed fires are described in the DEIS (p. 424). The increased amount of prescribed burning proposed in the preferred alternative would increase the exposure of NPS firefighters to the above irritants.

Recommendation:

EPA recommends that the FEIS and the Record of Decision (ROD) commit to the recommended measures (p. 424) to reduce smoke exposure of firefighters during prescribed burning.

4. The GGNRA region is nonattainment for ozone and particulate matter and must conform to the federally approved SIP (p. 172). Historically GGNRA has ensured conformity of their fire management plan by ensuring all prescribed burning is planned and implemented in accordance with the BAAQMD Smoke Management Program (p. 175). While the DEIS lists requirements of Section 176 of the Clean Air Act regarding general conformity, it does not state de minimus levels that trigger the need for a conformity determination.

Recommendation:

The FEIS should state the de minimus levels and whether general conformity is required.

### Water Quality

1. Fire roads can be a major cause of water quality problems and adverse impacts to aquatic ecosystems due to their contribution to sediment loads, subsequent in-stream habitat modifications and increased run-off. Other than Figure 2-7 Fire Roads (p.71) and a short description of roadside fuel reduction, the condition of fire roads and their contribution to water quality effects is not described or addressed.

Recommendation:

The FEIS should address the water quality and aquatic effects of roads by describing the status and management of the GGNRA fire road system. The FEIS should identify avoidance and mitigation measures that are necessary to minimize impacts. For instance, the FEIS should describe the density of roads per watershed; whether fire roads are a major contributor to water quality and aquatic resource impacts; and direction for the maintenance, closure, and designated uses of the fire roads. Because of the environmental impacts of fire roads, we recommend retiring the roads identified on Figure 2-7 (p. 71) as “possibly retire” and identifying the miles of proposed road retirement.

2. The DEIS states that herbicides will be used to control nonnative trees and brush that vigorously resprout (p. 84). Use of herbicides is of concern because of their potential impacts to water quality, fish and wildlife, and human health and safety. We understand that all herbicide use would be administered through the GGNRA integrated pest management coordinator and applied by a state-licensed pesticide applicator (p. 234). However, in the interest of full disclosure, we recommend additional information on proposed herbicide use be included in the FEIS. A project-specific environmental analysis should be considered if extensive use of herbicides is proposed.

Recommendations:

The FEIS should include additional information regarding herbicide use. Provide a description and environmental evaluation of frequently used herbicides (e.g., EPA Registration Number, key characteristics, environmental effects), frequency of use, the potential for multiple applications, and proposed measures to protect wetlands, sensitive resources, the public, and firefighters.

The FEIS should specify that:

- 1) The pesticides used must be registered with EPA and the California Department of Pesticide Regulation and used according to the label directions and Federal and State pesticide laws (Executive Order 12088).
- 2) Since the regulatory status of chemicals can constantly change, a review of the current status of all herbicides considered for use should be conducted prior to each application season.
3. Sensitive watersheds are located within GGNRA with highly erodible Franciscan Complex soils, steep slopes, and unstable geology, which can result in high erosion rates and sensitivity to disturbance (p. 165). In addition, there are specific water bodies such as Rodeo Lagoon which already experience water quality problems (p. 168).

Recommendation:

The FEIS should commit to project-specific environmental analyses whenever fire management activities are proposed in sensitive watersheds, near water bodies with existing water quality problems, or near key resources, such as Bolinas Lagoon. The analyses should evaluate the potential for erosion and sedimentation, nutrient inputs, and other adverse impacts to resources at risk.

4. Although the DEIS states that water quality monitoring has been conducted, it does not provide a summary of monitoring results or describe the specific water quality of specific water bodies (p. 167). The FEIS should provide a detailed water quality analysis.

Recommendation:

The FEIS should include water quality data obtained from the cited water quality monitoring projects. Provide a short description of the water quality characteristics of key water bodies and creeks, such as level of fecal coliform, sediment, nutrients, rate of stream flow, pH, biological oxygen demand, total dissolved solids, and temperature. State whether the water quality constituents meet water quality standards.

## Wetlands

1. The DEIS states that the intensity of impact to wetlands would be considered major if changes in the aerial extent, or in wetland vegetation, soils, or hydrology, would be measurable and would affect 20% or more of the total extent of the plant community in the FMP project area (p. 262).

Recommendation:

The FEIS should provide the rationale, references, and data to support the proposed 20% aerial extent criteria. Describe why other percentages such as 10% or 40% were not used. We recommend the NPS consider “intensity of impact” criteria which includes the quality and functional value of the wetland or resource instead of only an aerial percent loss of the vegetation type.

2. The DEIS states that planning and fire management plans for specific projects should consider other projects in the area and design projects so that the combined impacts of unrelated projects and fire management activities do not exceed the threshold for minor impacts on wetlands (measurable changes but affect less than 5% of the total extent of the wetland type in the project area) (p. 337).

Recommendation:

The goal of direct, indirect, and cumulative impacts to wetlands should be avoidance. The FEIS should commit to avoid all cumulative impacts to wetlands, whenever possible. Only if impacts are unavoidable should projects be designed to minimize and compensate or mitigate for wetland impacts. In these instances, project-specific analyses should be performed.

### **Park Operations**

1. The DEIS states that very few action items called for in the 1993 FMP have been implemented due in part to funding and staffing availability (p. 82). However, the preferred alternative would require additional funding and staffing (19 FTE versus the 13 FTE under the 1993 FMP, p. xxi, Table ES-2: Summary of Impacts). It is not clear whether, or how, GGNRA would obtain the funds and FTE required to fully implement the preferred alternative.

Recommendations:

The FEIS should describe the funding and staffing issues encountered under the 1993 FMP. Describe what has not been completed under the 1993 FMP.

Evaluate whether the funding and staffing issues will continue under the new FMP and what options are available to overcome these potential implementation barriers.

The FEIS should present management priorities and actions that will be taken if sufficient funding and staffing is not provided for full implementation of the new FMP. Describe the criteria, if any, used to prioritize implementation of FMP actions and to maximize the benefits and use of limited staff and funding resources.

Given the inability to completely implement the existing FMP, we recommend the NPS consider developing an alternative that can be fully implemented with existing authorized resources.

### **Existing Conditions**

1. While the DEIS describes the use of herbicides to control scrub and invasive species, it does not describe whether GGNRA lands are experiencing habitat conversions which would require future aggressive vegetation management. For example, other sites in California have experienced conversion of forest lands to scrub caused by wildland fires. As a result, the Forest Service has implemented extensive vegetation management projects using manual brush removal, prescribed burns, and multiple herbicide applications to eliminate and control brush.

#### **Recommendation:**

The FEIS should include additional information regarding invasive species and the conversion of forest and grasslands to scrub land, brush fields, or other habitat types that will require future vegetation management. Describe whether the FMP will include actions to control habitat conversions and to actively manage vegetation.

2. The vegetation map, acreages, and overall vegetation distribution are based upon 1994 aerial photography and interpolation (p. 186). It is possible that vegetation distribution and types may have changed in the intervening 11 years given invasive species, wildland fires, and climate change.

#### **Recommendation:**

The FEIS should evaluate the potential for vegetation change since 1994. If significant deviations from 1994 vegetation patterns are possible, the NPS should consider conducting additional vegetation surveys where such changes may have occurred.

### **General Comments**

1. The DEIS state that NPS is in consultation with the U.S. Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA)- Fisheries in accordance with Section 7 of the Endangered Species Act (p. 94).

#### **Recommend:**

The FEIS should include a short description of the status or outcome of the Section 7 consultation, including FWS and NOAA-Fisheries mandatory and recommended reasonable and prudent measures and terms and conditions for incidental take, if approved. If available, include the Biological Opinions or concurrence/nonconcurrence letters in a FEIS appendix.



2. Appendix C of the DEIS provides a list of projects included in cumulative effects analysis. The criteria used to determine which projects were included is not provided.

**Recommendation:**

The FEIS should provide a short description of the criteria and process used to select the projects included in the cumulative effects analysis.

3. The DEIS describes the scheduling and implementation challenges for prescribed burns in GGNRA. For instance, it states there is only a narrow burning window for shrub lands and forested areas and that designated burn days often do not coincide with the weather conditions appropriate for burning in GGNRA (p. 144).

**Recommendation:**

The FEIS should describe how the NPS proposes to accomplish the level of prescribed burning proposed in the preferred alternative, which is more than double the amount proposed in the existing 1993 FMP.