



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

OFFICE OF THE  
REGIONAL ADMINISTRATOR

June 30, 2005

Melissa Reichert, Forest Planner  
Forest Plan Revision Team GMNF  
231 N. Main Street  
Rutland, Vermont 05701

Re: Draft Environmental Impact Statement for Forest Plan Revision Green Mountain National Forest Eastern Region (CEQ # 20050137)

Dear Ms. Reichert:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Forest Service's (FS) Draft Environmental Impact Statement (DEIS) for the Green Mountain National Forest (GMNF) Forest Plan Revision. We reviewed the DEIS with an emphasis on how the alternatives discussed in the proposed Land and Resource Management Plan, if implemented, would affect water and air quality.

The DEIS describes five alternatives developed by the FS for management of the 400,000 acres of land in the GMNF located in central and southern Vermont. The current forest plan was adopted almost twenty years ago. The effort to revise the plan is intended to incorporate new information about the forest and changes in conditions and use since the development of the existing (1987) plan. EPA appreciates the opportunity to review the DEIS and to participate in interagency meetings to learn more during the development of the plan. The interagency forum was helpful and consistent with the inclusive public participation process the FS conducted in conjunction with the draft plan development.

We believe the five land allocation/management alternatives described in the DEIS present a reasonable range of use intensity for the forest. We believe either Alternative C, D, or E presents an acceptable balance among the various uses of the forest and demands on its resources. We appreciate the goal of maintaining traditional uses of the forest as a way of sustaining the economies that depend on them, and as a hedge against more environmentally intrusive and deleterious forms of development. The attachment to this letter includes comments concerning water quality, air quality, wetland and water resources, and green buildings for your consideration as you develop the Final Environmental Impact Statement (FEIS) for the Forest.

617-918-1010

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Thank you for the opportunity to comment on the DEIS for the Forest Plan Revision. Based on our review of the DEIS we have no objections to the project as described and we rate this EIS "LO-1 - Lack of Objections-Adequate" in accordance with EPA's national rating system, a description of which is attached to this letter. Please contact Steven Winnett (617-918-1687) of EPA's Office of Ecosystem Protection with any comments or questions about this letter.

Sincerely,

  
Robert W. Varney  
Regional Administrator

attachment

**Additional Detailed Comments on the Draft Environmental Impact  
Statement for Forest Plan Revision Green Mountain National Forest Eastern Region**

**Water Quality**

We support the use of the timber management practices that protect water quality as described in the DEIS and Forest Plan. We encourage the FS to limit disturbance activities (timber harvest and mechanized recreation activities) on steep slopes, and those with a high potential to erode (see Sec. 2.3.2, page 19, of the revised plan). Also, we encourage management that will ensure ecosystem stability and robustness against stressors such as pest and disease outbreaks, and potential large and/or permanent changes in climatic regimes.

We are very interested in impacts on water quality from developments, roads, and parking lots, and are willing to provide technical information related to the prevention and mitigation of impacts. We concur with the Recommendations and Opportunities (Appendix F, Roads, page F-3) and support and encourage all activities to stabilize existing roads against erosion that could harm water quality. We further recommend that innovative and/or traditional Best Management Practices (BMPs) be a required component in the design and construction of improved, refurbished, and newly constructed roads and parking lots in the Forest. Moreover, we suggest that standards and guidelines be developed for cleaning up roads following the winter season such as the requirement for road sweeping, or other similar BMPs, in the spring before rains wash road sand and salt into water bodies or drainage areas.<sup>1</sup> We are particularly concerned about road salts because they can pose a significant risk to sensitive aquatic species and water supplies. In addition, salt in water supplies is especially a concern to older populations and those with high blood pressure.

Construction and/or improvement of pit toilets and other sanitary facilities should ensure the protection of groundwater and surface waters. While we support the use of a 100 foot setback from open water (page 32 of the revised plan), we suggest that new and upgraded sanitary facilities should use new systems available in the region that better protect ground and surface waters from the harmful components of sanitary waste. EPA would be happy to supply you with information about such technologies. Here again we feel that the GMNF is a perfect place to demonstrate the use of new technologies and to raise awareness of such opportunities with the public (please see footnote 1).

**Wetland Functions**

The DEIS states that the Revised Plan goal is to "maintain or restore aquatic, riparian and wetland habitats." It further states that "the revised Plan will expand, through forest-wide

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<sup>1</sup>The GMNF is an ideal place to educate the public about storm water treatment, and we encourage the FS to take the opportunity to use signage or other demonstration techniques to draw the attention of the public to the use of BMPs and their benefits.

objectives, the protection for woodland pools, wetlands and riparian areas.” The revised Plan incorporates the State of Vermont Acceptable Management Practices (AMPs). These AMPs are specific to protecting water quality in streams and do not apply to protecting wetland functions (including water quality). Page 29 of the *Acceptable Management Practices for Maintaining Water Quality on logging Jobs in Vermont* states, “ Except for necessary construction of stream crossings a protective strip shall be left along streams and other bodies of water in which light thinning or selection harvesting can occur so that breaks made in the canopy are minimal and a contiguous cover is maintained. Log transfer machinery must remain outside a 25' margin along the stream or waterbody.” The AMPs were developed in 1987 and do not provide any practices to protect other wetland functions including flood storage, wildlife habitat and groundwater recharge and discharge. We believe the FS should expand on AMPs to provide practices protective of these functions.

### **BMPs to Protect Wetlands**

The DEIS states that National Wetland Inventory maps depict over 3,000 acres of open and scrub-shrub wetlands in the GMNF averaging four acres in size and ranging in size from less than one acre to 50 acres. The maps also show a similar acreage of forested wetlands. Further, the document acknowledges that seep and vernal pool habitats are widely distributed throughout the forest. These wetlands are often left unmapped because they are difficult to detect from the air. The FS should identify how these resources on GMNF lands can be better mapped in the future.

EPA recommends that the DEIS include BMPs that describe specific methods (such as the use of buffers) to protect wetlands (including vernal pools) in the GMNF. EPA attended an interagency meeting on November 15, 2004 to discuss forest-wide standards and guidelines to protect these resources.<sup>2</sup> At the meeting we discussed the need to have specific minimum buffer requirements around vernal pools and wetlands and to ensure that BMPs or AMPs adopted as part of the plan included measures that apply to wetlands relative to their functions in the landscape. We agreed in principle that the following measures would be incorporated into the plan and discussed in the DEIS:

- a 100 foot limited impact zone around individual vernal/seasonal pools or multi-pool complexes. Activity in the 100 foot zone would only be allowed for the enhancement of wildlife habitat and in accordance with the Maine Forestry Habitat Management Guidelines for Vernal Pool Wildlife, Metropolitan Conservation Alliance Technical Paper Series: No. 6 (as listed on page 22 with a modification to 70% canopy closure).

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<sup>2</sup>The meeting was attended by Marty Lefebvre, ACOE; Beth Alafat, EPA; Doug Blodgett, VT ANR; David C Grove FS; Steve Roy FS; Diane Burbank FS; Bill Culpepper FS; Chris Casey FS; Alan Quakenbush, VT DEC; Nancy Burt FS; and staff from VT Fish and Game.

- a 50 foot limited activity zone around wetlands (including beaver flowages) equal to or greater than 1.0 acre in size to protect hydrology, vegetation and wildlife habitat. Activity in the 50 foot zone would only be allowed for the enhancement of wildlife habitat. It was also agreed that the size of the limited activity zone and acceptable activities within the zone for seep areas and wetlands smaller than 1 acre should be determined on a case by case basis.
- consideration of a guideline to leave a higher concentration of snags around the wetland.

We continue to strongly urge the FS to reflect this interagency input and agreement in the FEIS and the subsequent forest plan.

We also recommend that work in or near wetlands occur during frozen conditions whenever feasible to minimize disturbance of wetland soils. And we note that we disagree with language in the DEIS that contemplates use of wetlands for temporary roads and skid trails and suggest that the FEIS reflect the avoidance of the use of wetlands for these purposes.

### **Air Quality**

EPA encourages the use of more efficient, less polluting snowmobiles with 4-stroke engines on the Forest. We suggest use of winter trailheads and other places where snowmobilers gather to promote the use of snowmobiles with 4-stroke engines and educate users as to the benefits of this technology to the Forest, the environment and other users of the Forest. We also suggest that the FS partner with snowmobile dealers to promote the new technology engines as EPA has successfully done with marine dealers who are promoting the new technology outboard motors.

The FS should also consider limiting or prohibiting motorized recreational use of the forest during periods where air quality is poor, or subject to worsening from climatic conditions.

### **Green Buildings**

We were not able to find references in the plan materials to designs for buildings. We recommend that the FS consider supplementing the standards and guidelines of the Forest Plan to incorporate "green building" strategies and goals consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System. These standards would provide requirements for building designs (again, both for new buildings and refurbished ones) that conserve energy, use recycled materials and include BMPs such as green roofs, rain gardens, and cisterns for capturing rain for reuse or delaying its release as storm water runoff.<sup>3</sup>

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<sup>3</sup>The US Green Building Council has information about LEED that may be helpful at [www.usgbc.org](http://www.usgbc.org).

## **Summary of Rating Definitions and Follow-up Action**

### **Environmental Impact of the Action**

#### **LO--Lack of Objections**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### **EC--Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### **EO--Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### **EU--Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### **Adequacy of the Impact Statement**

#### **Category 1--Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### **Category 2--Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### **Category 3--Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.