



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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BOSTON, MASSACHUSETTS 02114-2023

December 30, 2005

OFFICE OF THE
REGIONAL ADMINISTRATOR

Barbara Levesque, Forest Planner
White Mountain National Forest
719 Main Street
Laconia, New Hampshire 03246

Re: Final Environmental Impact Statement for Proposed Land and Resource Management Plan
White Mountain National Forest Eastern Region (CEQ # 20050491)

Dear Ms. Levesque:

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) Final Environmental Impact Statement (FEIS) for the White Mountain National Forest (WMNF) Eastern Region Plan Revision (Forest Plan). We reviewed the FEIS with particular attention to how it responded to comments we offered on the DEIS on December 14, 2004 and offer the following comments.

Alternatives

We are pleased that the WMNF selected alternative 2, which we felt presented an acceptable balance among the various uses of the forest and demands on its resources.

Standards and Guidelines

With regard to specific sections of the Standards and Guidelines in the Forest Plan (Chapter 2), we have the following comments on those issues which we highlighted in our comments on the DEIS and Plan.

Vegetation Management

EPA appreciates that the FS is requiring that State of Maine and State of New Hampshire *Best Management Practices* be met or exceeded in the National Forest (S-4).

Transportation System

EPA appreciates those parts of the Standards and Guidelines that address the placement of roads away from water bodies and that require stormwater controls be used during road construction. We note, however, that although "**Road Location, Design, and Construction**" (G-6) says that the use of appropriate control and management of storm water runoff should be considered in parking lot design, we believe the FS should require stormwater best management practices to be used in the design of parking lots and roads when they are constructed, reconstructed, refurbished, or repaired.

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Water Resources

EPA appreciates that “**Soil and Water Conservation Practices**” (S-4 and S-5) mandate use of stormwater BMPs (in affect) during construction activities, and that in G-1, new or reconstructed features (e.g., ditches and water bars) intended to capture runoff water should be designed to drain into areas suitable for trapping sediment and not directly into streams, wetlands, and vernal pools. However, such features mentioned above are not required to be used, which diminishes the requirement for their proper design and placement.

Under “**Road Maintenance**,” it isn’t clear who is responsible for maintenance of roads in the forest that are open during the winter, and who would be responsible for ensuring that BMPs are used to minimize sand and salt runoff from roads into water bodies. Although we understand that the FS itself may not be responsible for this, it seems that it should at a minimum set high standards for care of roads in the forest as it is FS lands and waters that stand to be negatively affected by poor practices and the input of sand and salt that follows from them. We continue to encourage the FS to look for opportunities to help reduce or eliminate sources of impact by improving road maintenance practices within and adjacent to the forest.

Thank you for the opportunity to comment on the FEIS for the Forest Plan Revision. Please contact Timothy Timmermann (617-918-1025) of EPA’s Office of Environmental Review with any comments or questions about this letter.

Sincerely,


Robert W. Varney
Regional Administrator