



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 15 2005

Paul K. Brewster
Forest Supervisor
Green Mountain and Finger Lakes
National Forests
US Forest Service
231 N. Main St.
Rutland, VT 05701

Dear Mr. Brewster:

The U.S. Environmental Protection Agency (EPA) has reviewed the Finger Lakes National Forest, draft environmental impact statement (draft EIS) (CEQ #050186), 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.

At only 16,000 acres, the Finger Lakes National Forest (FLNF) is one of the largest and continuous public areas in the region. EPA recognizes the challenges confronting the FLNF caused by increasing development, insect damage and invasive species, fire hazard, and, at times, conflicting forest use demands. We commend the new planning format that integrates an overarching vision, design criteria and legal framework, and forest-specific strategies linked to national goals. Of special note are the forest-specific goals and objectives and their characterization of desired conditions.

Three alternatives are evaluated in the draft EIS: Alternative 1 is the current management direction; Alternative 2 offers less human intrusion and focuses on future old growth forest management; Alternative 3 focuses on more recreation opportunities and on hardwood management for both wildlife and timber harvesting. The preferred alternative for the FLNF is Alternative 3.

Alternative 3 dedicates acres to the different management areas in amounts that fall somewhere between the two other alternatives. This alternative focuses on maintaining biological diversity and ecological integrity while providing an increase in recreation opportunities through reconstruction of trail facilities and construction of new facilities to accommodate increasing demand. It also proposes to maintain grazing on 32% of the forest lands, and nearly 40% of the forest would be available to timber harvesting. The draft EIS proposes to offer 80 acres annually for timber harvesting in the Northern Hardwood or Oak Hickory management areas. However, only 7% of the forest is proposed to be Future Old Growth and 3% is identified as Ecological Special Areas. EPA would wholly support the implementation of Alternative 3, given that certain modifications directed toward further ecological resource protection be made.

The Forest Plan contains particular goals that refer to ecological resource protection. For example, Goal Four discusses maintaining or restoring riparian, vernal pools and wetland habitats and Goal Six discusses protecting rare or outstanding ecological areas. The draft EIS

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Postconsumer, Process Chlorine Free Recycled Paper

states that 277 acres, or less than 2% of the total forest area, are mapped wetlands, which indicates that these are rare and important areas. The draft EIS suggests on pages 3-139 and 3-165 for example, that the Forest Plan direction protects wetlands and vernal pools. However, the Plan does not offer specific directions or Forest-wide standards and guidelines that achieve the goals identified in the Plan or would offer actual protection to these particular resources. The draft EIS identified that ground disturbance and canopy altering activities are great threats to wetlands and vernal pools. Such threats would suggest that, for these areas, specific guidelines and direction would be necessary. We recommend that the Forest Plan and the final EIS offer specific standards and guidelines for riparian areas, vernal pools, wetlands, along with any other rare and outstanding ecological areas that have not yet been identified as such.

In a related matter, the draft EIS states that the perched white oak swamp is a rare and very important ecological area. Three such areas are found in the forest and the draft EIS discusses that these areas are threatened by both reproductive isolation and timber harvesting. We appreciate that the Forest Plan and draft EIS identify one area, the Blueberry Patch swamp, as an Ecological Special Area (ESA), providing specific management direction and protection from timber harvesting. However, EPA is concerned that the other two perched white oak swamp areas in the FLNF are not similarly proposed for designation or even identified. Given that the threat from timber management is the more likely of the two threats that the Forest Service can control, we recommend that these areas be designated as containing at least Regional Forester Sensitive Species, if not full ESA protection, and should be protected from timber harvesting. If these two other areas were designated and the Forest Plan proposed specific standards and guidelines for their protection or even enhancement, then we believe that the additional threat of reproductive isolation would be also minimized. National Forests are considered core areas for the maintenance of biological diversity. With that in mind, FLNF should be considered as such an area within the broader spectrum of state forests, national and state wildlife refuges, and state parks, to further the viability of natural areas and the species that depend on them.

We are also concerned with the impacts to wetlands from grazing. The draft EIS states that fewer FLNF wetlands are found in open areas such as in the North Eastern part of the Forest, which contains the grazing for livestock management area; however, these wetlands tend to be larger and more connected. According to the draft EIS, a number of the wetlands are near or within drainages for streams. The draft EIS offers that riparian areas and ponds will be fenced for their protection from livestock. However, the draft EIS specifically refers to streams, stream crossings, and ponds being protected from livestock impacts, and does not mention naturally occurring wetlands and other waters of the U.S. Grazing can significantly impact wetlands through changes in hydrology and loss of vegetation. Therefore, we are concerned that the draft EIS does not specifically state that livestock will be similarly restricted from wetland resources. We believe that livestock grazing measures should be considered that would offer alternatives to grazing in soft bottomed wetlands and waters of the U.S. or that those wetlands occurring close to streams and livestock watering areas be fenced as well. We recommend that the final EIS address this suggestion and offer further protections to wetland resources.

This raises an additional concern with the recognition of the importance of the connectivity of wetlands, riparian areas, and other important ecological areas. Though the combined draft EIS and Forest Plan outline management directions for some of these areas, the documents do not discuss the impacts to the lands outside of these areas and the indirect effects. For example, if timber harvesting were to occur upstream or adjacent to a wetland area or a water dependent

ESA, that activity could impact the hydrology and function of the larger riparian corridor and the overall wetland complex. While the designate area is not directly impacted, its viability can be compromised by the loss of the important functions of the areas around it. Maintaining connectivity through hydrology, species diversity, and habitat types, and minimizing impacts to these surrounding areas as well, is critical to the overall success of the various research natural areas (RNAs), candidate RNAs and ESAs, as well as those important but undesignated areas such as wetlands and other waters of the U.S. We recommend that the final EIS provide a discussion of the areas surrounding the designated special resource areas as well as other important areas to identify and recognize the contributions those areas provide to the viability and success of the desired outcome for the forest as a whole.

Additionally, the draft EIS was lacking a map that would indicate the location of the Forest's wetlands. Such a map would be very useful in understanding what wetlands were located in the various sections of the FLNF and perhaps enabled us to provide more specific comments. Also, the draft EIS did not indicate if the results obtained from monitoring the streams suggest that the current timbering area buffer strip widths (50-110 ft) are adequate, or if they should be modified. We recommend that the final EIS provide this information and offer a more detailed discussion of the location of the wetlands.

Given these comments, we have rated the preferred alternative 3 as Environmental Concerns - Insufficient Information (EC-2). However, if the Forest Service implements the additional resource protection modifications to alternative 3, we would be pleased to fully support the Forest Plan and final EIS. Please see the enclosed Rating Factors for a description of EPA's rating system.

We appreciate the opportunity to review this draft EIS. When the final EIS is released for public review, please send two copies to the address above. If you have any questions, please contact me at 212-637-3504 or David J. Carlson, of my staff, at 212-637-3502 or at carlson.david@epa.gov.

Sincerely yours,



John Filippelli, Chief
Strategic Planning and Multi-Media Programs Branch

Enclosure:
Summary of EPA Rating Definitions

cc: R. Moore, Regional Forester