UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

October 24, 2014

Jeff DeFreest, District Ranger
Ketchikan-Misty Fiords Ranger District
3031 Tongass Avenue
Ketchikan, Alaska 99901

RE: EPA comments on the Saddle Lakes Timber Sale Draft Environmental Impact Statement (EIS), EPA Project #12-0023-AFS.

Dear Mr. DeFreest:

We have reviewed the above-referenced EIS (CEQ No. 20140262) proposed for Revillagigedo Island in Southeast Alaska. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS proposes a no action alternative and five action alternatives that include varying levels of timber harvest and road construction, as well as the reconstruction of the Shelter Cove log transfer facility and modification of a fish passage barrier. The project area includes National Forest System and private lands. The Forest Service has identified Alternative 4, which would produce about 51 mmbf of timber from 2,875 old growth acres and will support up to 243 jobs, as its preferred alternative.

Overall, we support the selection of this alternative given the greater benefits to the local economy and comparable impacts to most resources as the alternatives impacting fewer old growth acres. We commend the Forest Service and its partners for identifying a more economically feasible alternative that does not substantially increase impacts in comparison to other lower yield alternatives. We believe this alternative provides a reasonable balance in implementing the Forest Service's mandates under the Tongass Timber Reform Act of 1990, compliance with the Tongass Land and Resource Management Plan goals and objectives and support of the project's purpose and need. We also appreciate the EIS's succinct analysis, detailed alternatives maps, index and acronym list inside the front cover.

We do, however, request that the Forest Service continue to work to achieve further reductions in potential impacts to visual resources, deer habitat (and subsequent impacts to subsistence), as well as impacts to water quality from new and temporary road miles. Given the known impacts of road construction and stream crossings on water quality, particularly due to sediment loading, and the lack of data for many of the water bodies within the project area, we believe monitoring of road impacts is critically important. We recommend that the final EIS contain information that clearly identifies Forest Service resources for monitoring and enforcement, as recommended by the Council on Environmental Quality's *Memorandum on Appropriate Use of Mitigation and Monitoring*, January 14, 2011. We believe that robust implementation and enforcement of the standards and guidelines, best management practices, and mitigation measures identified in Appendix C is necessary to ensure that predicted impacts are accurate and that mitigation is adequate. An adaptive management strategy should be

included in the Final EIS and adopted in the Record of Decision to allow the Forest Service to quickly change mitigation efforts if monitoring reveals that the mitigation is not fully successful.

We request that discussions concerning the EPA's National Pollutant Discharge Elimination System authority be augmented with information concerning the State of Alaska's authority to permit discharges under its Alaska Pollutant Discharge Elimination System program. Finally, we request that the omission of the (-) on page 33 under the Alternative 3 column, Black Bear Habitat-Historic POG Within 500-feet of Class I Fish Streams, be corrected.

Based on our review, we have assigned a rating of "LO" (Lack of Objections) to the draft EIS. A description of out rating system is enclosed. Please contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov with any questions you have regarding our comments.

Sincerely,

Erin Peterson for

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure