UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

May 5, 2014

Maggie Seaberg
Upper North Fork ID Team Leader
P.O. Box 180
11 Casey Road
North Fork, Idaho 83466

RE: EPA Comments on the Upper North Fork HFRA Ecosystem Restoration Project Draft Environmental Impact Statement, EPA Project # 11-4119-AFS

Dear Ms. Seaberg:

We have reviewed the above-mentioned Draft Environmental Impact Statement (DEIS) in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our NEPA Review policy and procedures, we rate DEIS documents by considering both the adequacy of the document and the potential environmental impacts of the action.

The DEIS evaluates two alternatives (Alternative 1-Proposed Action and Alternative 2-No New Temporary Roads) for an integrated hazardous fuels and forest restoration project for the purposes of reducing hazardous natural fuels, restoring plant communities and improving fish and wildlife habitat diversity, while returning resilient conditions to the fire adapted landscape. The DEIS also evaluates the impacts if no activities relative to the proposal were taken, as required by the Healthy Forest Restoration Act.

We find the DEIS does a good job in evaluating the effects of the proposed action, and that overall sufficient efforts have been made to avoid and minimize the adverse effects of the action. Therefore, we rate the document "LO" (Lack of Objections). Please see the enclosed description of our rating system for more information. We have identified some recommendations for your consideration as you move from the Draft to the Final EIS.

Overall we appreciate the Forest Service's responsiveness to our scoping comments, namely considering an alternative that does not include new temporary road construction (Alternative 2). We believe Alternative 2 as designed is the environmentally preferable alternative as it does not include new temporary roads, and also entails less tractor and skyline logging. Should the Forest Service proceed with Alternative 1 (the Proposed Action), we note that there are some units (such as Units 93, 98, 103 and 233) where it appears that temporary road construction does not influence the harvest method (i.e., those units are proposed for tractor logging under both action alternatives). Where this is the case, we recommend that the Forest Service avoid temporary road construction unless it can be demonstrated that temporary road construction would result in less potential environmental impact, particularly in the long-term. We also recommend that the monitoring of any road sites with the potential for adverse impacts to water

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quality impacts be included in the Record of Decision (site-specific monitoring instead of sample monitoring as identified in Appendix A).

We are supportive of the use of the ICO (individual, clumps and openings) approach to thinning developed by Larson and Churchill (2012) and are pleased to see the trend toward creating species and spatial heterogeneity within the project area. We also support the proposed amendment to allow for wildfire use to achieve management objectives. We believe the associated analyses of air quality and airshed impacts is satisfactory.

Also, while we do not oppose the proposed amendment to modify road buffer widths for Pacific Anadromous Fish Strategy Riparian Habitat Conservation Areas to allow for mechanical treatment above the road outside of the modified riparian habitat, we believe that of the eleven sites, some sites may incur adverse impacts to water quality. We recommend site-specific monitoring for these sites.

Finally, we believe that the Final EIS would benefit from additional information concerning future plans for replanting. We generally support lower density planting than what has been proposed in past projects under the HFRA. We believe this will result in a more resilient landscape that will self-maintain for decades and require less intervention into the future. If this is the goal of the project, the Final EIS should clearly state this and include appropriate monitoring to ensure this goal is being met. If, however, additional burns are expected in the future, this should be included in the cumulative effects analysis, and impacts to air quality should be identified.

We appreciate the opportunity to review this DEIS. If you have questions concerning our comments, please contact me at (206) 553-1601 or reichgott.christine@epa.gov, or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov.

Sincerely,

Christine B. Reichgott

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

Enclosure

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (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

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 these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should 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

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 potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (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 of 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 National Environmental Policy Act 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.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.