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

APR 09 2010

Laura Greffenius, EIS Project Coordinator
U.S. Fish and Wildlife Service
1011 East Tudor Road, MS-231
Anchorage, Alaska 99503

Re: EPA Comments on the USFWS Final EIS for the Yukon Flats Land Exchange
EPA Project # 05-059-FWS

Dear Ms. Greffenius:

The U. S. Environmental Protection Agency (EPA) has reviewed the U.S. Fish and Wildlife Service (FWS) Final Environmental Impact Statement (FEIS) for the **Proposed Land Exchange-Yukon Flats National Wildlife Refuge** (CEQ # 20100062) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA expressed concerns with the draft EIS based on the: lack of appraisal information; evaluation of a limited range of alternatives; potential impacts to air and water quality, as well as aquatic resources; potential for cumulative effects; evaluation of climate change impacts to the project; among other issues. Based on our review of the FEIS, we believe that with the selection of the No Action Alternative as the Preferred Alternative by the FWS, many of our previously identified concerns are no longer valid. In addition, the FWS has supplemented or revised several sections of the FEIS, to include additional information relating to the impacts on the project from climate change, land ownership and tribal consultations. We also appreciate clarification provided in the FEIS on project purpose and need as it relates to Refuge goals, and a detailed explanation of "No Surface Occupancy" for consideration of potential impacts.

Although the FEIS identifies the No Action Alternative as the FWS's Preferred Alternative, it is unclear if the FWS decision-maker has the ability to select one of the analyzed action alternatives in the Record of Decision (ROD). If this is the case, we are concerned that the realty appraisals that were initiated for this process were not completed prior to the FEIS, and will not be available to the decision-maker for his consideration in the ROD. We believe this information is critical to the analysis and should have been completed for inclusion in the FEIS. We continue to recommend that this appraisal be completed for full consideration by the decision-maker in the ROD. We would also continue to have concerns relating to the potential impacts to air and water quality, as well as aquatic resources.

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Thank you for the opportunity to review this FEIS. Please feel free to contact Jennifer Curtis of my staff in Alaska at, (907) 271-6324 or by electronic email at curtis.jennifer@epa.gov with any questions that you may have.

Sincerely,

Christine B. Reichgott

Christine Reichgott, Manager
Environmental Review and Sediment Management Unit

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