UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 27, 2005

B-19J

Thomas A. Schmidt, Forest Supervisor
USDA – Forest Service
Hiawatha National Forest – Forest Plan Revision
2727 N. Lincoln Road
Escanaba, Michigan 49829

RE: Draft Environmental Impact Statement for the Proposed Land and Resource Management Plan for the Hiawatha National Forest, Alger, Cheboygan, Chippewa, Delta, Luce, Mackinac, Marquette and Schoolcraft Counties, Michigan. EIS No. 20050127

Dear Mr. Schmidt:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Land and Resource Management Plan (proposed Forest Plan) for the Hiawatha National Forest in Michigan. The proposed Forest Plan establishes management direction for 895,313 acres of HNF resources and is based on the Preferred Alternative (Alternative 2) identified in the DEIS.

The Hiawatha National Forest (HNF) consists of the West Unit and East Unit located in the central and eastern portion of Michigan's Upper Peninsula. The HNF touches three Great Lakes (Superior, Michigan and Huron) and contains five Congressionally designated wild and scenic Rivers (Indian, Carp, Whitefish, Sturgeon, and East Branch Tahquamenon). Wetlands and their associated habitat comprise over 39 percent of the HNF managed land. The HNF supports a variety of uses including recreation and timber production. There is a mix of public and private lands within the 1,294,600 acres proclamation boundary. Through implementation of the proposed Forest Plan, the Forest Service intends to meet the objectives of federal laws and regulations, provide the public a variety of resource uses, recreational experiences, goods and services while managing ecosystems to provide for long-term sustainability.

The challenges the Forest Service is confronting while managing the HNF under the multiple-use concept are well documented in the DEIS. The DEIS identifies a variety of issues driving the need for revising the current 1986 Forest Plan. Two issues and their associated sub-issues: (1) Vegetation Management (Vegetation Composition and Structure,

Species Viability, and Old Growth) and (2) Recreation Access (Great Lakes and Inland Lakes Access, and Motorized and Non-Motorized Trails) are identified as significant driving issues.

The U.S. Forest Service evaluated four feasible alternatives in the DEIS. All alternatives meet the DEIS purpose and need and adhere to the concepts of multiple-use and ecosystem management. Alternative 1, the No Action alternative, represents continuing management as stipulated under the 1986 Forest Plan with minor revisions. Alternative 2, the DEIS Preferred Alternative, emphasizes managing vegetation both for a mix of early and late seral species within the ecological capability of the land, and for uneven-aged hardwood sawlog management. Alternative 2 also responds to comments about motorized and non-motorized lake access and settings, and provides for more off-highway vehicles (OHV) and snowmobile loop and connected trails. Alternative 3 emphasizes managing vegetation for higher timber product outputs and less old growth forests and highlights more hunting and motorized recreational opportunities. Alternative 4 emphasizes less commodity production, more old growth characteristics and more restriction on motorized access. We believe that this range of alternatives is responsive to comments received from the public during the scoping phase.

The U.S. EPA commends the Forest Service for its thorough treatment, in the DEIS, of an extensive array of natural resources and forest uses, all of which need to be evaluated in the context of the Forest Plan. We support the management direction for protection of watersheds, in part, through restoration and management of riparian corridors and their associated vegetation, intermittent and perennial streams, lakes and wetlands, and through the use of 500-foot vegetative buffers on high priority streams. Protection and restoration efforts of these resources will help maintain and enhance water quality and habitat in the Great Lakes basin. U.S. EPA supports vegetative management that promotes vegetative conditions that represent native species in age, size and successional states including old growth forests that support native wildlife and fish species, including populations of threatened and endangered species, and Regional-Forester designated sensitive species. We also support adaptive management and restrictive use approaches for managing natural resources that are adversely impacted by recreational activities, especially those associated with OHV, personal water craft (PWC) and snowmobile use**.** Because DEIS Alternative 2 best incorporates these principles while balancing the multiple-use demands placed upon the Hiawatha National Forest, EPA concurs with the selection of Alternative 2 as the Preferred Alternative.

EPA has no objections to the Forest Service's proposed Forest Plan for the Hiawatha National Forest. We have rated the DEIS an "LO" - Lack of Objections. We have enclosed an explanation of our rating. To further substantiate plans for the Hiawatha National Forest, the Forest Service should consider providing the following information in the Final Environmental Impact Statement:

- Include all applicable State of Michigan Best Management Practices (BMPs) and Forest Service Region 9 standards for protecting soils, flora and fauna, stream and lake water quality, and wetlands for the variety of activities that take place in the

HNF, including but not limited to: (1) timber harvesting, (2) re-vegetation, (3) road, trail and boat access facility construction, repair, decommissioning and operation, and (4) mineral extraction. This information will better serve the reader's understanding of the minimum measures that should be implemented to protect these vital resources for specific projects as the Forest Plan is carried out.

- Coordination letters from resource agencies especially U.S. Fish & Wildlife Service, Michigan Department of Natural Resources, and the Michigan Historic Preservation Officer. This information would provide an interested reader with a sense of whether there were areas of debate between agencies or whether federal and state agencies concurred with the Forest Service's direction.

Thank you for the opportunity to review the DEIS and the Proposed Land and Resource Management Plan. If you have any questions, please contact Virginia Laszewski of my staff at (312) 886-7501.

Sincerely,

/S/

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems, and Communities

Enclosure (1)

cc: Randy Moore, Regional Forester, USDA Forest Service, Eastern Region,
626 E. Wisconsin Ave., Milwaukee, WI 53202

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections
The 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
The 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 the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections
The EPA review has identified significant environmental impacts that must 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
The 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 sate, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate
The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alterative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting 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 the EPA to fully assess the 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 NEPA 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 the Federal Actions Impacting the Environment