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

January 20, 2009

Reply to
Attn Of: ETPA-088 Ref: 05-030-AFS

Mr. Frank Roberts, Zone Leader
USDA, Forest Service-Alaska Region
Thorne Bay Ranger District, Tongass National Forest
ATTN: Logjam DEIS
P.O. Box 19001
Thorne Bay, AK 99919

Dear Mr. Roberts:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the proposed **Logjam Timber Sale** in the Thorne Bay Ranger District, Prince of Wales Island, in the Tongass National Forest of southeast Alaska (CEQ No. 20080486). Our review has been conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS describes four action alternatives and a No-Action alternative, which provide differing resource outputs and responses to issues identified for this project, as well as potential mitigation measures. Significant issues identified include effects to aquatic habitat, wildlife and subsistence use, timber supply and economics, and inventoried roadless areas (IRAs). The decision on whether or not to harvest timber from this area, and the manner in which it should be harvested, will be made by the Tongass Forest Supervisor in accordance with the 2008 Tongass National Forest Land and Resource Management Plan (Forest Plan) goals, objectives, and desired conditions.

According to the DEIS, Alternative 1, the No Action alternative, proposes no new Forest harvest activities in the project area at this time; Alternative 2, the Proposed Action, proposes timber harvest using ground based and helicopter logging systems to log approximately 75 million board feet (MMBF) on about 3,703 acres, including 99 acres within inventoried roadless areas (IRAs), and 29 new miles of road; Alternative 3 proposes to utilize similar logging systems to log approximately 52 MMBF on 2,708 acres and construct 15 miles of new road; Alternative 4 proposes similar logging systems for 38 MMBF on 1,694 acres and 13 miles of new road; and, finally Alternative 5, involves logging of 68 MMBF on 3,348 acres with 18 miles of new road. Alternative 2 has been designed to maximize timber harvest while Alternative 5 emphasizes timber sale economics while maximizing total volume harvested. Alternative 3 addresses effects related to road construction, stream crossings and roadless characteristics of the IRAs, as well as the cumulative effects of past harvest on stream flow. Alternative 4 minimizes wildlife habitat fragmentation by emphasizing wildlife habitat and travel corridors. Alternative 4 also maintains current roadless characteristics. A Preferred Alternative is not identified in the DEIS.

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Overall, the DEIS includes a good description of the purpose and need for the proposed timber sale, a discussion of action alternatives, a comparative analysis of impacts including cumulative effects, and actions to offset the impacts and monitor their effectiveness. The DEIS also indicates that Best Management Practices (BMPs) will be used to minimize impacts to resources in the project area.

We have given a rating of EC-1 (Environmental Concerns - Adequate) to this project due to concerns about potential impacts related to the construction of up to 29 miles of new road and 8 miles of temporary road under Alternative 2 (the proposed Alternative). This road construction, in conjunction with ground-based harvest methods, stream crossings, and cumulative effects from past timber harvest activities would pose a greater risk to aquatic and wildlife resources than other alternatives identified in the DEIS. An explanation of the EPA rating system is attached to this letter. The rating and a summary of these comments will be published in the Federal Register.

Preferred Alternative

EPA commends the Forest Service for including alternatives in the DEIS that minimize impacts to water quality, as well as aquatic and wildlife habitat. EPA supports the selection of Alternative 3 or 4, which emphasize water quality and habitat protections while minimizing miles of new road and reductions in old growth habitat, as the Preferred Alternative in the final EIS over the Proposed Action (Alternative 2) or Alternative 5, which have the most effect on sedimentation and aquatic habitat. Selection of Alternative 3 or 4 will allow the Forest Service to meet the purpose and need identified in the EIS but also achieves the Forest Service's forest health objective of "moving the project area towards the desired condition for all resources".

Other Comments

EPA recommends that the final EIS reflect the delegation of the National Pollution Discharge Elimination System (NPDES) program under Section 402 of the Clean Water Act to the State of Alaska. This delegation will impact all future reissuances of the log transfer facilities (LTF) affected by this project since LTFs were included in Phase 1 of the delegation, which occurred on October 31, 2008. EPA also recommends that the final EIS distinguish between federally-recognized tribal governments and native corporations, given the unique relationship federal agencies have with tribal governments.

Thank you for the opportunity to comment on this DEIS. If you would like to discuss our comments further, please contact Jennifer Curtis of my staff at (907) 271-6324 or curtis.jennifer@epa.gov.

Sincerely,

/s/
Christine Reichgott, Manager
NEPA Review Unit

Enclosure:
Summary of EPA Rating Definitions

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