UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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DEC 3 1 2015

Ref: 8EPR-N

Doug Herzog, Forest Planner
Caribou-Targhee National Forest
1405 Hollipark Dr.
Idaho Falls, ID 83401

Email: **comments-intermtn-caribou-targhee@fs.fed.us**

Re: Targhee National Forest Lynx Analysis Unit, Draft EIS; CEQ # 20150320

Dear Mr. Herzog:

The U.S. Environmental Protection Agency Region 8 has reviewed the *Targhee National Forest Lynx Analysis Unit Draft Environmental Impact Statement* (EIS). The Caribou-Targhee National Forest proposes to establish Lynx Analysis Units (LAU) that will be used to analyze the effects site-specific projects may have on Canadian Lynx. Our comments are provided for your consideration pursuant to our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Comments and Recommendations

Estimates of Primary and Secondary Vegetation (Lynx Habitat)
The Draft EIS, Appendix A (page 81) states that there are limitations to using the Targhee National Forest Ecological Unit Inventory data due to the challenges and complexities of defining ecological unit types from large scale mapping. Further, the initial estimate of primary and secondary vegetation may be refined as new site-specific information becomes available. The site-specific information would be gathered at the project scale. It is unclear, without further incorporation of information from the Northern Rockies Lynx Management Direction (NRLMD), the extent to which standards and guidelines could change in their application at the project scale if the site-specific amount of lynx habitat is substantially different from the initial estimate. We recommend that more information from the NRLMD be incorporated in the Final EIS to clarify how the project-level information may change lynx habitat protections.

Endangered Species Act – Section 7 Consultation
The Draft EIS states (page 62) that consultation with U.S. Fish and Wildlife Service (USFWS) on the Biological Assessment will be completed prior to release of the Final EIS. However, because there is only one action alternative, the delayed consultation with USFWS limits the disclosure of information in the Draft EIS. For future agency proposals focused on Threatened and Endangered Species, we recommend the USFS Biological Assessment and effects determination be included in the Draft EIS. For example for this EIS, it would be helpful to know what concerns, if any, the USFWS may have regarding the LAUs and the RMP Amendment (NRLMD).

Activities to Improve Potential Lynx Habitat

We recommend that the Final EIS clarify whether there are any vegetation management procedures or goals that will be used to analyze site-specific activities in the LAUs and identify any proposed mitigation measures to improve lynx habitat. In particular, the 2009 *Greater Yellowstone Ecosystem Lynx Study*[1] noted that the Big Holes area appears to have sufficient prey abundance and habitat structure for lynx habitat. Please clarify whether site-specific projects in this area would be evaluated differently. We recommend the Final EIS include any mitigation measures that should be implemented for site-specific projects to expand or protect the LAUs with better potential for lynx habitat.

Rating of EIS

It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, including rating the magnitude of potential environmental impacts and the adequacy of the environmental analysis in the NEPA document. Consistent with Section 309 of the Clean Air Act, the EPA is rating the Draft EIS as *Lack of Objections* (LO). A full description of the EPA's rating system can be found at: http://www2.epa.gov/nepa /environmental-impact-statement-rating-system-criteria.

We appreciate the opportunity to comment on this document and hope our suggestions for improving it will assist you with preparation of the Final EIS. We would be happy to meet to discuss these comments and our recommendations. If you have any questions or requests, please feel free to contact either me at 303-312-6704, or Dana Allen of my staff at 303-312-6870 or by email at allen.dana@epa.gov.

Sincerely,

Philip S. Strobel, Director
NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc: EPA, Region 10

[1] Holmes, M. and Berg, N. 2009. Greater Yellowstone ecosystem lynx study. Endeavor Research Foundation. Jackson, WY: http://www.yellowstone.co/pdfs/lynxstudy2009.pdf.