UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 12, 2010

Charlie Stenvall, Project Leader
Willapa National Wildlife Refuge Complex
3888 SR 101
Illwaco, Washington 98624-9707

Re: U.S. Environmental Protection Agency (EPA) comments for the Lewis and Clark National Wildlife Refuge and Julia Butler Hansen Refuge for the Columbian White-tailed Deer (Refuges) Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/DEIS). EPA Project Number: 10-013-FWS

Dear Mr. Stenvall:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned an LO (Lack of Objections) rating to the CCP/DEIS. A copy of the EPA rating system is enclosed.

We concur with your conclusions about the positive effects of the preferred alternatives and support their selection on both Refuges. Expanding partnerships for invasive species, research and land management will increase the Refuge's capacity to be effective. Eliminating time limits on coyote management appears necessary to maximize Columbia White-tailed deer recovery efforts. Improving interpretive media and developing appropriate land and water trails will raise the public's awareness of the unique and important roles of the Refuges. All of these elements - which are limited to your preferred alternatives - would result in substantial environmental and social positive effects.

We applaud your efforts to disclose climate change effects and management implications on the Refuges. Section 3.5.3, "Potential Changes to the Refuges", is particularly useful and concludes with a commitment to, "...begin a focused effort to plan on how best to deal with climate changes in the lower Columbia River estuary." (p. 3-11). We support this commitment and recommend that the Final CCP/EIS include additional information on the process that the Refuges' intend to follow (e.g., timeframes, perspectives on key decision points and/or relationship(s) to national law, policy or guidance etc.).

We also recommend that the Final CCP/EIS include additional clarifying information on water quality issues in the Columbia River estuary. The CCP/DEIS's conclusion that, "The release of toxic contaminants, nutrient loading and reduced dissolved oxygen have altered the water quality in the Columbia River estuary." only generally identifies water quality issues

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facing the Refuges (p. 3-21). To better understand water quality issues around the Refuges consider EPA's links and information on the: (i) Lower Columbia River Estuary Partnership, (ii) Region 10 Coastal Environmental Monitoring and Assessment Program, (iii) Columbia River Basin Fish Contaminant Survey, and, (iv) Total Maximum Daily Loads (TMDLs) for the Lower Columbia.[1] Please also consider EPA's "Columbia River Basin State of the River Report for Toxics".[2]

We appreciate your efforts to protect native ecosystem processes and if you have any questions or concerns please contact Erik Peterson of my staff at, (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

Christine Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures:
EPA Rating System for Draft Environmental Impact Statements

[1] http://yosemite.epa.gov/r10/ECOCOMM.NSF/Columbia/Lower+Columbia
[2] http://yosemite.epa.gov/r10/ecocomm.nsf/Columbia/SoRR/

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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

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