UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

July 18, 2016

Robert Dalrymple, District Ranger
Wrangell Ranger District
PO Box 51
Wrangell, AK 99929

Dear Mr. Dalrymple,

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Wrangell Island Project, in southeast Alaska (EPA Project #11-003-AFS). We have reviewed the Draft EIS in accordance with our responsibilities under the National Environmental Policy Act, as well as Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we also evaluate the document's adequacy in meeting NEPA requirements. A description of our rating system is provided in Enclosure 2.

According to the Draft EIS, this multi-year project is being proposed for the purposes of timber harvest, the construction of new roads and landings, and the reconditioning of existing roads. It is also intended to update some road access management decisions on Wrangell Island in the Tongass National Forest. Five alternatives are detailed in the Draft EIS, providing differing outputs and responses to issues identified through the scoping process for this project. The U.S. Forest Service has identified Alternative 2 as its preferred alternative (even- and uneven-aged harvest of timber from approximately 5,309 acres of forested land, producing an estimated 65 million board feet (MMBF) of sawtimber and utility wood, 17.2 miles of new road construction, 5.8 miles of reconditioning and 14.9 miles of temporary road construction).

Overall, we commend the USFS for the thorough environmental analysis of the various impacts associated with each of the alternatives. We are particularly pleased with the integration of direct, indirect and cumulative impacts analyses, as well as the identification of impacts by issue and resource. The extensive use of maps, tables and figures is very beneficial to the reader. Descriptions of the applicable statutes and policies which apply to this analysis are also quite comprehensive and useful.

Based on our review of the Draft EIS, we have assigned a rating of EC-2 (Environmental Concerns-Insufficient Information) to Alternative 2. This rating is based primarily on concerns about potential impacts to water quality, wildlife habitat and habitat connectivity, subsistence activities, and scenic qualities. Detailed information regarding these concerns is included in Enclosure 1.

We recognize that all proposed action alternatives respond to the goals and objectives identified by the 2008 Tongass Land and Resource Management Plan, and help provide a "bridge" supply of timber to support local jobs and industry transition to a more sustainable wood product industry. While Alternative 2 does increase the opportunity for partial harvest using helicopter compared to the other action alternatives, we believe that, in general, Alternatives 3, 4 and 5 are environmentally preferable to Alternative 2 because these alternatives would reduce impacts to the various resources of concern while

also meeting project goals. We also believe the selection of any of the action alternatives necessitates a clear mitigation and monitoring program employing adaptive management to ensure that any unanticipated impacts are identified in a timely manner and are properly managed. The Draft EIS does identify a comprehensive program of best management practices and associated monitoring to be employed under the proposed alternatives.

Finally, if there are particular changes anticipated in the current Tongass Land and Resource Management Plan Amendment which could substantially affect the decisions made in this EIS, we recommend that the FS consider delaying this project until finalization of the Tongass Land and Resource Management Plan (Final EIS and Draft Record of Decision appeal period closes August 1, 2016). We realize that the justification for and timing of this project is detailed in Appendix A. The relation between this action and the current Tongass LRMP amendment does not appear to be specifically addressed. We recommend that additional information regarding this issue be included in the Final EIS.

Again, we appreciate the opportunity to review the Draft EIS. Should you have any questions regarding our comments please contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by electronic mail at curtis.jennifer@epa.gov.

Sincerely,

Christine B. Littleton

Christine B. Littleton, Manager
Environmental Review and Sediments Management Unit

Enclosures:

1. Detailed Comments On The US Forest Service Wrangell Island Project – Draft Environmental Impact Statement
2. US Environmental Protection Agency Rating System For Draft Environmental Impact Statements

ENCLOSURE 1

DETAILED COMMENTS ON THE US FOREST SERVICE WRANGELL ISLAND PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT

Water Quality
Each action alterative has the potential to impact various waterbodies and wetlands, as well as other associated aquatic resources. Impacts are primarily associated with road and bridge construction, placement of fill, and harvest activities (particularly on steep slopes). We believe that strict adherence to USFS BMPs is critical to minimize impacts, particularly to avoid sediment runoff into lakes and streams which support anadromous fish species. Also, if BMPs are not as effective as anticipated, appropriate adaptive management programs need to be in place to quickly adjust mitigative actions.

We also recommend that the USFS consider whether additional analysis may be warranted to determine if there are opportunities in the planned road alignment to avoid or minimize the placement of fill, especially in higher value wetlands. This may require on-the-ground reconnaissance and the completion of a wetlands functional assessment.

Habitat and Wildlife Corridors
The potential for substantial impacts to habitat and habitat connectivity exist with each action alternative. This is a particular concern given the decline in suitable habitat for several species on Wrangell Island since intensive logging occurred in the latter part of the twentieth century. While many of these areas have been identified for future youth (second) growth harvest in the future, the loss of these areas necessitates greater protection of those areas where high quality habitat and corridors remain. As such, we recommend that the action alternatives include actual wildlife corridors (in addition to the currently identified productive old growth corridors) and that the final EIS include additional opportunities to avoid high quality habitat and documented corridors.

Scenic Qualities
We recognize that each alternative includes harvest prescriptions that meet or, many times exceed, the scenic integrity objectives identified for the corresponding unit. We believe there are additional opportunities to further minimize the harvest activity or harvest area to reduce impacts to the areas identified as "moderate" and "high" scenic integrity. We recommend that additional consideration be given to this issue and, if practical, be incorporated into the corresponding alternatives in the Final EIS.

Subsistence
We note that the Draft EIS states that "the direct effects from the Wrangell Island Project could affect subsistence uses of deer, black bear, marten, wolves, and timber, as well as the collection of firewood, berries and other forest products" (p. 234). Given the depressed economy in southeast Alaska, including the community of Wrangell and Thom's Place, we recommend that, in addition to the Alaska National Interest Land Conservation Act Section 810 analysis, the USFS consider additional measures to further mitigate these impacts. For example, relocation of species from other nearby areas may be a way to address any decline in population numbers and species availability.

Specific Comments
Figure 2 identifies two "Non-FS Land" classifications in the key but does not differentiate between the two. Please correct if this is an oversight.

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.