



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

September 17, 2018

Petersburg Ranger District
c/o Carey Case
P.O. Box 1328
Petersburg, Alaska

Dear Ms. Case:

The U.S. Environmental Protection Agency has reviewed the Forest Service's August 9, 2018 Notice of Intent to prepare an environmental impact statement for the Central Tongass Project (EPA Project Number: 18-0050-AFS). Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

According to the NOI, the Forest Service is proposing a multi-year project to implement a variety of activities over the next 15 years within the Central Tongass project area. The Proposed Action is designed to address four categories of needs: Watershed Restoration and Improvement, Vegetation Management, Access Management, and Sustainable Recreation Management. To address these needs, the Proposed Action includes up to 700 acres of instream wood placement, 9,500 acres of old growth and 4,000 acres of young growth timber harvest, 24 miles of road construction, 150 stream crossing improvements, 6 new cabins, and 60 miles of motorized trail construction.

We note the Forest's January 18, 2018 Central Tongass Questionnaire Cover Letter usefully communicates the aim of the project and is an example of the Forest's valuable effort to gather community input. According to the January 2018 Cover Letter, "In short, this project aims to better meet the expectations of our partners and communities through an integrated approach to resource management"¹ In the interest of supporting the Forest's efforts to meet partner's and communities' expectations and to effectively gather community input, we recommend consideration of the National Forest Foundation's collection of tools, best practices and peer learning sessions for aiding groups, Forest Service staff, and community partners in the practice of collaboration.² Another useful resource to consider is the Fall 2017 Ecosystem Workforce Program Working Paper Number 81, "Strategies for Success Under Forest Service Restoration Authorities"³

¹ https://www.fs.usda.gov/nfs/11558/www/nepa/108304_FSPLT3_4395382.pdf

² <https://www.nationalforests.org/collaboration-resources/learning-topics/collaboration>

³ https://ewp.uoregon.edu/sites/ewp.uoregon.edu/files/WP_81.pdf

In addition, based on our experience with vegetation management EISs, we recommend this EIS compare the alternatives in terms of their influence on the following:

- impacts on water quality, fish population strongholds, sensitive species and wildlife habitat;
- facilitation of natural disturbance and forest development processes at the stand and landscape scales;
- retention of large snags, downed logs and large wood in streams;
- risk to fragile soils, landslides, and erosion from steep slopes;
- introduction and spread of invasive species;
- risk of undesirable wildfire in the short, medium and long-term;
- impacts to tribal and/or cultural resources;
- enforcement and monitoring of administrative road closures;
- implications of changes in the climate.

We are also enclosing detailed comments for your consideration.

We appreciate the opportunity to participate early in the planning process and would be happy to engage further. If you would like to discuss these comments, please contact me at (206) 553-6382 or by email at peterson.erik@epa.gov.

Sincerely,



Erik Peterson
Environmental Review and Sediment Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Detailed Scoping Comments Central Tongass Project, Alaska

**U.S. Environmental Protection Agency
Detailed Scoping Comments
Central Tongass Project, Alaska**

Roads

Road construction and reconstruction are of key concern to the EPA because roads contribute more sediment to streams than any other management activity and interrupt the subsurface flow of water, particularly where roads cut into steep slopes. In addition, roads and their use contribute to habitat fragmentation, wildlife disturbance, the introduction or exacerbation of noxious weeds, and increased fire danger from recreational activities. Given these concerns, overall, we encourage the Forest to focus on the use of existing system roads that do not require extensive reconstruction and minimize road construction to the extent practicable.

Recommendations

1. We recommend the EIS include a description of how roads in the watershed currently impact resources and describe the change in road miles and density that would result from the project.
2. If road reconstruction is incorporated as a project element, it should be noted that roads that have been closed for a long time may have stabilized. The EIS should disclose where existing roads will be reconstructed and the current impacts or improvements they present to the resources of concern.
3. Where roads are proposed for closure, we recommend the EIS describe how roads will be closed.
4. If the project includes administrative road closures, we recommend the EIS describe what enforcement measures will be utilized and the monitoring program that will be implemented to ensure they are effective.
5. If the project includes road obliteration, the EIS should describe measures to be used to stabilize the soil and keep it in place.

Timber Harvest, Invasive Weeds and Rare Plants

Timber harvest can accelerate erosion, impact sensitive resources, alter forest structure and composition, and increase the risk of introduction of invasive species.

Recommendations

1. We recommend the EIS discuss how logging will proceed in sensitive areas (i.e., previously burned areas, fragile soils, steep slopes, riparian areas, watersheds with severe sedimentation problems, and fish population strongholds).
2. The EIS should explore how the timing of entry can be adjusted to minimize environmental impacts.
3. We recommend the EIS discuss how proposed prescriptions will promote and restore forest structure, composition, and function, especially in areas near or adjacent to stream corridors.
4. We recommend the EIS include a description of current conditions, and best management practices, which will be utilized to reduce the likelihood of introduction and spread of invasive species.
5. The EIS should identify whether there are any threatened, endangered, candidates, sensitive, or other plant species of concern within or near the project area that could be affected by proposed

actions. We recommend the EIS include general locations of rare or special status plants, and how these sites would be managed to avoid impacts on the plants.

Ecological Forestry

The EPA supports silvicultural practices which are based on an understanding of natural disturbance and stand development processes. Such an approach has come to be referred to as ecological forestry. Managing established stands to sustain or restore structural and compositional heterogeneity is an important principle of ecological forestry.

Recommendations

1. We recommend the EIS describe how proposed harvest and thinning prescriptions reflect the consideration of natural disturbance and stand development processes.
2. We recommend the EIS reflect consideration of the existing seed bank (i.e. what is likely to regenerate naturally), and the level, extent, and species composition of any replanting.
3. We recommend thinning and treatments should create and maintain structural and compositional complexity and heterogeneity consistent with stand development processes and disturbance agents. Relevant references include:
 - a. Churchill, D.J., A.J. Larson, S.M.A. Jeronimo, P.W. Fischer M.C. Dalhgreen, and J.F. Franklin. 2016. The ICO approach to quantifying and restoring forest spatial pattern: Implementation guide. Version 3.3 Stewardship Forestry and Science, Vashon, Washington, USA.⁴
 - b. Churchill, D.J., A.J. Larson, S.M.A., M.C. Dalhgreen, and J.F. Franklin. 2013. The ICO approach to quantifying and restoring forest spatial pattern: Implementation guide. Version 2.0. Stewardship Forestry, Vashon, Washington, USA
 - c. Churchill, D.J., A.J. Larson, M.C. Dalhgreen, J.F. Franklin, Hessburg, P.F., and James A. Lutz. Restoring forest resilience: From reference spatial patterns to silvicultural prescriptions and monitoring. *Forest Ecology and Management* 291 (2013) 442-457
 - d. USDA General Technical Report NRS-19 “Natural Disturbance and Stand Development Principles for Ecological Forestry”⁵
 - e. Larson, A.J., Churchill, D. 2012. Tree spatial patterns in fire-frequent forests of western North America, including mechanisms of pattern formation and implications for designing fuel reduction and restoration treatments. *Forest Ecology and Management*, 267 (2012) pp 74-92
 - f. Franklin, J.F., K.N. Johnson, D.J. Churchill, K. Hagmann, D. Johnson, and J. Johnston. 2013. Restoration of dry forests in eastern Oregon: a field guide. The Nature Conservancy, Portland, OR. 202 p.

⁴ https://www.fs.usda.gov/nfs/11558/www/nepa/103397_FSPLT3_3986281.pdf

⁵ http://www.fs.fed.us/nrs/pubs/gtr/gtr_nrs19.pdf

Habitat

Project activities may directly and indirectly impact habitat quality and connectivity.

Recommendations

To protect the quality and connectivity of aquatic and terrestrial habitat we recommend the EIS:

1. Describe the current quality of habitat on and near the proposed project area;
2. Identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation;
3. Evaluate the cumulative alteration and fragmentation of aquatic and terrestrial habitat caused by roads, land use, management activities and human activity;
4. Evaluate effects on plants, fish and wildlife from habitat removal and alternation, aquatic and terrestrial habitat fragmentation caused by roads, land use, management activities and human activity;
5. Discuss how the proposed activities would support the retention of large snags, downed logs and large wood in streams, and
6. Incorporate the range of firewood gatherers from roads into the snag retention guidelines.

Cumulative Effects

The EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*.⁶

The guidance states that to assess the adequacy of a cumulative impacts assessment, five key areas should be considered. The EPA assesses whether the cumulative effects analysis of an EIS:

1. Identifies resources, if any, that are being cumulatively impacted;
2. Determines the appropriate geographic area (within natural ecological boundaries) and the time-period over which the effects have occurred and would occur;
3. Describes a benchmark or baseline;
4. Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern; and
5. Includes scientifically defensible threshold levels.

We recommend the NEPA analysis take the above steps to analyze and disclose cumulative impacts to identified resources of concern.

Ecosystem Services

The juxtaposition of landscape features affects key physical, chemical, and biological functions that convey myriad social, ecological, and economic benefits. For example, mature, complex forests recharge groundwater, provide clean drinking water, regulate stream flows, purify air and water, absorb greenhouse gases, and offer scenery, recreation, and wildlife habitat. Fully functional floodplains enhance water quality, provide valuable aquatic habitat, and reduce flooding. Maintenance and restoration of such key functions enhance the resilience of communities and ecosystems to stressors,

⁶ <https://www.epa.gov/sites/production/files/2014-08/documents/cumulative.pdf>

such as those that may arise due to changes in climate. We recommend these services be acknowledged, accounted for using quantitative (where feasible) or qualitative means, and fully considered in decision making.

To integrate ecosystem services into agency decision making, include the following elements in the NEPA process:

1. Describe the federal action;
2. Identify and classify key ecosystem services in the location of interest, i.e., the affected environment;
3. Assess the impact of the Federal action on ecosystem services relative to baseline;
4. Assess the effect of the changes in ecosystem services associated with the federal action; and
5. Integrate ecosystem services analyses into decision making.

Climate Adaptation

The EPA recommends the EIS include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area. This could help inform the development of measures to improve the resilience of the proposed project. If projected changes could notably exacerbate the environmental impacts of the project, EPA recommends these impacts also be considered as part of the NEPA analysis. These recommendations are also consistent with the guidance issued by the Forest Service in January 2009.⁷

Coordination with Tribal Governments

We recommend that EIS development be conducted in consultation with all affected tribal governments, consistent with Executive Order 13175 (*Consultation and Coordination with Indian Tribal Governments*). The EIS should discuss whether the proposed project would affect tribal natural and/or cultural resources and address any concerns of the tribes in accordance with federal tribal trust responsibilities.

Monitoring

We recommend the project include a monitoring program designed to assess impacts from the project, and the implementation and effectiveness of measures taken to mitigate impacts. The EIS should describe the monitoring program, how it would be used, and the likely extent to which it would be adequately implemented/funded.

⁷ http://www.fs.fed.us/emc/nepa/climate_change/includes/cc_nepa_guidance.pdf