



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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REGIONAL
ADMINISTRATOR'S
DIVISION

Carey Case, Project Leader
Petersburg Ranger District
P.O. Box 1328
Petersburg, Alaska 99833

SEP 16 2019

Dear Ms. Case:

The U.S. Environmental Protection Agency has reviewed the Forest Service's July 2019 Draft Environmental Impact Statement for the Central Tongass Project (EPA Project Number 18-0050-AFS; CEQ Number 20190173). Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Draft EIS compares the effects of alternatives for meeting the following landscape scale objectives: contribute to jobs and labor income in local and regional communities in the timber and tourism sectors, contribute to improved terrestrial and aquatic conditions that support the viability of subsistence resources, and provide safe access to Forest users on the Petersburg and Wrangell Ranger Districts.

Overall, we appreciate that the Draft EIS is well-written and organized and includes substantial responsive information relative to our September 2018 scoping comments.

Aquatics

Regarding potential adverse impacts to aquatic resources, the Draft EIS describes how the action alternatives would increase the risk of: peak flow impacts on aquatic conditions in seven or eight of the project area's watersheds, sediment impacts from new road crossings, and cumulative harvest related temperature impacts.^{1,2,3} The Draft EIS also includes Activity Guides with elements that would reduce the above potential adverse impacts.⁴ To further reduce the risk of potential adverse temperature impacts, we recommend consideration of temperature factors for the peak flow and water quality risk assessment contained in Appendix A's Resource-Specific Design Features for Aquatics.⁵ For example, the EIS could add language after the "Factors that are considered to evaluate potential peak flow effects..." or elsewhere as appropriate for temperature factors. Temperature factors to consider include: stream shade loss, reduced hyporheic/groundwater exchange with the stream, lower "non-peak" flows (i.e., spring/summer/fall), and thermal microclimate effects.

The Draft EIS also describes several proposed actions that would improve aquatic conditions compared to existing conditions and the no action alternative. We note the Draft EIS's list of actions which would

¹ Draft EIS, p. 171-176

² Draft EIS, p. 177

³ Draft EIS, p. 179

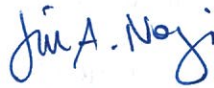
⁴ Draft EIS, Appendix A

⁵ Draft EIS, p. A-67

contribute to improved aquatic conditions: stream, lake and floodplain restoration, fish habitat and passage improvements, invasive plant management, and road-related activities that improve fish passage, water quality or watershed function.⁶ Based on our review, we recommend the EIS include additional information on how the action alternatives would facilitate/increase passage improvements for aquatic organisms relative to the no action alternative, as this information could further disclose how the action alternatives would contribute to the improvement of aquatic conditions. For example, the Final EIS could include additional information on integrating needed passage improvements into Appendix A's Resource-Specific Design Features for Aquatics.⁷

Thank you for the opportunity to provide comments on the Draft EIS. If you have questions about our review, please contact Erik Peterson of my staff at 206-553-6582 or by email at peterson.erik@epa.gov, or you may contact me at (206) 553-1841 or by email at nogi.jill@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jill A. Nogi".

Jill A. Nogi, Chief
Policy and Environmental Review Branch

⁶ Draft EIS, p. 6

⁷ See, for example, Draft EIS, p. A-75