



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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Seattle, WA 98101-3188

REGIONAL  
ADMINISTRATOR'S  
DIVISION

September 30, 2020

Mr. Earl Stewart, Tongass Forest Supervisor  
Attention: Twin Mountain II Timber Sale  
Thorne Bay Ranger District  
PO Box 19001  
Thorne Bay, Alaska 99919

Dear Mr. Stewart:

The U.S. Environmental Protection Agency has reviewed the Notice of Intent to prepare an Environmental Impact Statement for the proposed Twin Mountain II Timber Sale Project on Thorne Bay Ranger District of the Tongass National Forest, Alaska (EPA Region 10 Project Number: 20-0047-USFS). 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.

**Project summary**

According to the NOI, the US Forest Service proposes to evaluate the potential environmental impacts associated with a proposal to harvest up to 42 million board feet of timber in the Staney and Red Bay areas (3,000 acres) of the Ranger District over 5 to 10 years. The other project activities would include transportation management and new and temporary road construction, reconstruction, maintenance and decommissioning. Specifically, the project would involve:

- Timber harvesting of up to 32.4 MMBF on approximately 1,800 acres of even-aged stands;
- Harvesting of 9.6 MMBF on nearly 1,200 acres of uneven-aged stands;
- 3 miles of new road construction;
- 11 miles of temporary road construction; and
- Reconditioning of approximately 35 miles of existing roads.

If implemented as proposed, the project would move the planning area toward the desired future conditions, consistent with the 2016 Forest Plan direction. In addition, there is a need to provide a sustainable level of forest products to contribute to the economic sustainability of the region.

**Resource management recommendations**

EPA recommends the following list of resource concerns be considered in the Project NEPA analysis because while timber management and associated activities can help to ensure diverse and sustainable forest stands and restore water quality, they can also accelerate erosion and sedimentation to streams, impact habitat quality and sensitive resources, impede fish passage, and increase the risk of introduction of invasive species.

To address our overall resource concerns related to the proposed timber management and associated activities, we recommend that the EIS address the following topics.

- How roads in the project area currently impact terrestrial and aquatic resources and how project related road work and use would impact sediment in streams, subsurface flow of water, habitat fragmentation, wildlife disturbance, fish passage, noxious weeds, and fire danger from recreational activities;
- How enforcement and monitoring for administrative road closures will be implemented to ensure they are effective;
- How soils will be stabilized during road decommissioning;
- Which waterbodies may be impacted by the Project, the nature of the potential impacts, and specific pollutants likely to impact those waterbodies;
- How the proposed activities would impact the retention of large snags, downed logs and large wood in streams;
- How harvesting activities have been designed to minimize impacts to fragile soils, steep slopes, riparian areas, watersheds with sedimentation problems, and fish populations;
- How proposed even-aged and uneven-aged harvest prescriptions reflect the consideration of natural disturbance and stand development processes;
- How the proposed action – and subsequent actions if necessary – will decrease the risk of undesirable wildfire in the short, medium and long term;
- Measures to reduce the likelihood of introduction and spread of invasive species;
- The general locations of rare or special status plants and how these sites would be managed;
- Whether the proposed project would affect tribal natural and/or cultural resources and how the forest plans to address tribal concerns; and
- The potential effects of the Project on climate change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action.<sup>1</sup>

Thank you for the opportunity to provide early input on the project planning process. If you have any questions about our recommendations, please contact Betsy McCracken at (907) 271-1206 or by electronic mail at [mccracken.betsy@epa.gov](mailto:mccracken.betsy@epa.gov) or you may contact me (206) 553-6387 or at [baca.andrew@epa.gov](mailto:baca.andrew@epa.gov).

Sincerely,

Andrew J. Baca  
Director

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<sup>1</sup> <https://www.fs.fed.us/pnw/science/scifi182.pdf>