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Organization: U. S. Environmental Protection Agency, Region 10

Title: Manager

Comments: March 29, 2016

Stephen Penny

500 North Mission Street Building 2

McCall, Idaho 83638

Dear Mr. Penny:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed Middle Fork Weiser River Landscape Restoration Project on the Council Ranger District of the Payette National Forest (EPA Project Number 98-043-AFS). Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DEIS analyzes the Forest Service's proposal to implement treatments that would move the proposed project area toward a more resilient condition and provide a diversity of habitats consistent with the Payette National Forest Land and Resource Management. Proposed treatments would include a variety of commercial and noncommercial vegetation treatments on approximately 20,713 acres; prescribed fire on 30,569 acres; and watershed improvements including 80.7 miles of road decommissioning with 24.6 miles of roads decommissioned within Riparian Conservations Areas. The project units would be located within an 80,000 acre project area. The DEIS analyzes a no action alternative and four action alternatives. Alternative 2 is the agency's proposed action.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be clear, well organized, and robust. We support the collaborative landscape restoration approach and appreciate the Forest's responsiveness to issues raised during scoping. We agree with the design of RCA treatments and the riparian guidelines outlined in Appendix 5. Overall, we find the treatments proposed under Alternatives 2 to align with the broad body of science emerging about dry and moist mixed conifer forests <sup>1</sup>

We also recognize the Forest's focus on improving hydrologic condition within the project area. We commend the Forest for utilizing on the ground survey protocols for use in the Geographic Road Analysis and Inventory Package (GRAIP) and the rapid assessment GRAIP Lite tool to help prioritize sediment related work. We note that Alternative 3 emphasizes watershed restoration by including fewer vegetation treatments and decommissioning a greater number of upland roads and roads within RCAs- 87.9 miles and 26.2 miles respectively. While we support the activities proposed under Alternative 2, we recommend considering decommissioning roads comparable to the watershed restoration alternative to further reduce sediment loading. Additionally, the DEIS includes modeled sediment loading per subwatershed. In order to quantitatively assess the benefits to long-term water quality, it would be useful

1 [http://www.fs.fed.us/pnw/publications/MMC\\_Synthesis\\_21Nov13.pdf](http://www.fs.fed.us/pnw/publications/MMC_Synthesis_21Nov13.pdf)

to include the predicted sediment reduction by each alternative in the EIS. This information would allow the public and decision makers to better compare and contrast water quality measures under each alternative and determine which measures best promote desired aquatic/riparian conditions.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We support the collaborative, science-based ecosystem restoration of priority forest landscapes consistent with the purpose of the Collaborative Forest Landscape Restoration Program. We also support the Forest's continuing engagement of the Payette Forest Coalition on this project.

We appreciate the opportunity to review and comment on the DEIS. If you have any questions about our review, please contact me at (206) 553-1601, or by email at [littleton.christine@epa.gov](mailto:littleton.christine@epa.gov). Or you may contact Lynne Hood of my staff at (208) 326-2859, or by email at [hood.lynn@epa.gov](mailto:hood.lynn@epa.gov).

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

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

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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.

