Data Submitted (UTC 11): 12/17/2019 9:00:00 AM
First name: Robert
Last name: Tomiak
Organization: U.S. Environmental Protection Agency
Title:
Comments: The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

Ken Tu

Alaska Roadless Rule

USDA Forest Service

Post Office Box 21628

Juneau, Alaska 99802-1628

Dear Mr. Tu:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for Rulemaking for Alaska Roadless Areas (CEQ 20190254).

The draft EIS and proposed rulemaking are in response to the State of Alaska's January 2018 petition requesting that U.S. Department of Agriculture exempt the Tongass National Forest from the 2001 Roadless Rule. The draft EIS analyzes six alternatives including the No Action Alternative. Other than expanding the suitable timber land base, none of the action alternatives propose to change the Tongass Land and Resource Management Plan, including the projected harvest level. The USFS has identified Alternative 6 as the preferred alternative. The preferred alternative provides maximum additional timber harvest opportunity as the full exemption alternative which was requested by the State of Alaska's petition. It removes all 9.2 million inventoried roadless acres on the Tongass from roadless designation.

The EPA appreciates the USFS's responsiveness to our scoping comments in the development of this draft EIS in our October 11, 2018 letter. We are providing detailed comments for consideration as you begin to prepare the final EIS. If you have any questions, concerns, or need assistance, please contact me at (202) 564-5400 or Julie Roemele, lead reviewer for this EIS, at (202) 564-5632 or via email at roemele.julie@epa.gov. We look forward to reviewing the final EIS related to this project.

Sincerely,

Robert Tomiak

Director

Office of Federal Activities

Enclosure

U.S. Environmental Protection Agency Detailed Comments on the Draft Environmental Impact Statement for the Rulemaking for Alaska Roadless Areas

Tiering Process

The EPA recommends the USFS provide clarification on the process for subsequent NEPA analyses for future ground-disturbing activities and how future site-specific NEPA analyses relate to this EIS as well as the 2016 Forest Plan Final EIS. In addition, the EPA recommends the final EIS include a flow chart to better explain the process and the relationship to other NEPA documents.

Chugach National Forest
Scope

For consistency and clarity, the EPA recommends that the Chugach National Forest is discussed more throughly in the EIS by moving the discussion in the Scope of the EIS on why the administrative boundary changes to the Chugach National Forest is being considered to the purpose and need discussion along with the discussion of what is included as part of the administrative actions that is listed in the alternatives discussion. In the scope of the EIS, we recommend that the location of the Chugach National Forest to the Tongass National Forest be discussed and a map of the Chugach National Forest be included.

Public Involvement

The EIS states "The Regional Forester may issue administrative corrections after a 30-day public notice and opportunity to comment period" and "The Regional Forester would provide at least a 45-day public notice and opportunity to comment period for all modifications." (2-4). Please expand on this public involvement process to explain how the Regional Forester would consider any public comments received on the administrative corrections or modifications to the Chugach National Forest.

Information from Regulatory Impact Assessment

The Regulatory Impact Assessment (RIA) relied on data that detailed the historical numbers of the timber harvest and road density during the temporary exemption period through the period after the exemption was lifted. This historical data was not included in the draft EIS. The EPA recommends the USFS include this data in the affected environment section in the EIS for consistency and completeness.

Incorporating the 2016 Forest Plan Final EIS

In multiple chapters. the draft EIS references that the impacts are similar or the same to those disclosed in the 2016 Forest Plan Final EIS. While it is appropriate to incorporate by reference, the EIS would benefit from including a summary of the effects for each of the various impacts from the 2016 Forest Plan Final EIS. This will reduce the need for the reader to search for the summary findings in the 2016 Forest Plan Final EIS.

Comparative Summary Among Alternatives

The general discussion for impacts to Wetlands in Chapter I, Purpose and Need for the Action (p. 1-9), provides a good example of a comparative summary among the alternatives. The EPA recommends the USFS use a comparative summary format similar to the Wetlands section for the following sections in Chapter 1: Water Quantity and Quality, Air Quality, General Vegetation, General Wildlife Species/Habitat, and General Aquatics.

[Position]

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