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Title: Region 10

Comments: The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's Draft Environmental Impact Statement for the South Revillagigedo Integrated Resource Project, Alaska (CEQ Number 20200177; EPA Project Number: 18-0049-AFS). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DEIS evaluates the potential environmental impacts associated with a proposal to manage timber resources, improve ecosystem and watershed health, and provide a range of recreation opportunities over the course of 15 years. The project area would be nearly 53,000 acres of land, of which 44,371 acres would be public land and 8,224 acres would be exchanged with the Alaska Mental Health Trust Authority. The proposed activities would involve timber harvesting on over 6,000 acres to remove up to 92 million board feet; construction of nearly 50 miles of new and temporary access roads and maintenance of over 34 miles of closed forest system roads; wildlife habitat management using timber harvesting of old-growth trees on more than 4,600 acres and in high value winter ranges of over 400 acres; and scenery and recreation management. For analysis of impacts from these activities, the USFS considered three action alternatives and a no action alternative. The DEIS does not identify the agency's preferred alternative for implementation.

We are pleased to note that the identification of planning criteria, significant issues, and alternative actions addressed in the NEPA document considered inputs received from the public and issues we raised during the project scoping period in September 2018, including the anticipated cumulative effects of this project and impacts of climate change. Overall, we find that the DEIS includes an adequate description of resources in the analysis area and indicates necessary measures to protect them, including best management practices to reduce impacts and monitoring to ensure their effectiveness. The DEIS also shows how the project would be implemented to protect aquatic resources.

Of the proposed action alternatives, we encourage the USFS to consider selection of Alternative 3 for implementation because it would appear to minimize the anticipated impacts overall compared to the other action alternatives. For example, Alternative 3 would result in relatively less disturbance and volume of timber supply (about 79 MBF) than the other action alternatives, greater wildlife habitat connectivity, least clearcutting acreage and adverse effects from other silvicultural treatments, and minimal number of stream crossings.

Because of the proposed project's potential impacts to a variety of resources in the planning area over the 15-year lifespan, we recommend that the USFS coordinate with other federal and state agencies, affected tribes, and other impacted entities, particularly adjacent landowners to the project area, to ensure that the planned activities are implemented in a manner protective of human health and the environment. In addition, we encourage the USFS to include in the Final EIS additional clarifying or missing information as described in the attached detailed comments.

U.S. Environmental Protection Agency Detailed Comments on the DEIS for the South Revillagigedo Integrated Resource Project

## Tongass National Forest, AK

### Potential impacts to water quality and aquatic resources

Because the project activities may impact water quality and aquatic resources, resulting in alterations of streamflow (magnitude, timing, and duration) and changes to water quality parameters (temperature, sedimentation, and turbidity) of these pollutant receiving waters, we recommend that the FEIS:

- \* Provide information on the most recent EPA-approved Water Quality Standards for the State of Alaska and implications for water quality protection within waterbodies in the analysis area and vicinity.<sup>1</sup> We believe that it would be important for the public to know the State WQS to determine the extent to which this project would impact water quality. The DEIS indicates water quality data for affected watersheds are unavailable and that effects analysis was based on literature data.<sup>2</sup>
- \* Discuss the project impacts analyses and conclusions based on the most recent WQS information. Where WQS are exceeded, it will be important for the EIS to discuss how these impaired streams and creeks would be restored;
- \* Provide information that demonstrates how water quality would be maintained or improved in streams that are currently meeting WQS in accordance with the State of Alaska antidegradation policies to protect existing and designated beneficial uses of surface waters;<sup>3</sup>
- \* Include the most current information regarding the status of the Clean Water Act Section 401 certification and Section 404 permit application process, as well as conditions to protect water quality and wetlands;<sup>4</sup>
- \* Indicate how the project implementation would adhere to the Alaska Forest Resources and Practices Act requirements, particularly regarding water resources protection and related best management practices and monitoring (compliance and effectiveness);<sup>5</sup>
- \* Include up-to-date information on the anticipated Alaska Pollutant Discharge Elimination System permit application process including measures to protect water quality and development of Storm Water Pollution Prevention Plans, reporting, and monitoring; and
- \* Discuss the National Pollutant Discharge Elimination System permit application process and measures to protect water quality. The DEIS indicates that project construction would disturb an area of about 12,500 acres of land, which would subject the project to NPDES permitting requirements for discharges to waters of the United States and a related Stormwater Pollution Prevention Plan, as well as construction best management practices, may be required as well; and
- \* Describe plans to coordinate with the Alaska Departments of Environmental Conservation and Natural Resources' Division of Forestry, and all affected tribes to ensure that state and tribal water resources are protected from impacts associated with activities under the proposed action.

### Potential impacts to soils and restoration practices

We recommend that the USFS consider soil restoration practices even if detrimental soil conditions are below 15 percent. Timber harvest that leaves areas of bare soil can accelerate erosion, runoff, and landslides. These adverse impacts can occur after timber harvest activities, as well as during project activities. The DEIS states that if "detrimental soil conditions approach or exceed 15 percent of an activity area, soil restoration practices should be considered."<sup>6</sup> The DEIS determined that for this project, the percent of an activity area will be below 15 percent and total about 1,020 acres.<sup>7</sup>

Since sediment is one of the primary water quality parameters affected by project activities, we recommend that the USFS:

- \* Focus on hydrologic connectivity in addition to road density in the prioritization of road and restoration treatments;
- \* Identify tools to predict sediment delivery to streams and determine measures to take to minimize impacts associated with increased sediment loads in streams, particularly in those that are fish-bearing or are impaired; and
- \* Consider using the GRAIP-lite model, which is specifically designed to assess the road sediment impact to streams at a broad scale and across sub-watersheds, be used to the extent possible.<sup>8</sup> This is important because roads are usually the primary source of excessive sediment input to streams, particularly where the roadside ditches drain near to or directly into stream channels. We note that the project would include a significant number of road stream crossings, raising the possibility of increased sediment discharge into these streams and impediment to fish passage.<sup>9</sup>

#### Climate Adaptation and potential air quality impacts

The Tongass National Forest is believed to play a considerable role in lessening the impacts of climate change because it stores substantially more forest carbon than any other national forest in the United States, we recommend that the USFS actions in the planning area be conducted to preserve such capability.<sup>10</sup> For that reason, we also encourage the USFS to include in the FEIS a discussion on plans for reforestation in the decision area. Reforestation and reduced timber harvest are among the best land management practices for carbon sequestration.<sup>11</sup> Consistent with the 2016 Tongass Land and Resource Management Plan Amendment Record of Decision, EPA recommends the USFS continue to manage this project planning area as a mostly intact ecosystem with a robust monitoring program that will allow for adaptive management intervention if and when effects of climate change are detected.<sup>12</sup>

Regarding air quality impacts, EPA recommends the FEIS:

- \* Include quantitative data on current air quality conditions within the project area, indicating whether the area meets the National Ambient Air Quality Standards;<sup>13</sup>
- \* Estimate air emissions from all sources for the analysis area and discuss the timeframe for release of these emissions over the lifespan of the project, and determine whether the emissions would exceed NAAQS;
- \* Identify appropriate mitigation measures to reduce emissions and comply with state and federal air quality regulations if emissions exceed the standards;
- \* Discuss plans to monitor air quality in the project area and take corrective action if the NAAQS are not met. Such monitoring should be tailored to local conditions because localized air quality impacts can be substantial, even though area-wide and/or long-term monitoring may show compliance with NAAQS; and
- \* Provide information on coordination with other entities in the area, especially ADEC and affected tribes, to ensure emissions due to the proposed project are reduced over the project lifespan (15 years).

The DEIS states air quality in the project area maybe impacted due to road maintenance and construction, timber harvest, use of vehicular and helicopter equipment, recreation development and use, and other land management actions involving fuel-burning and vehicle traffic.<sup>14</sup> Air quality may also be impacted due to cumulative impacts from marine vessel emissions, regular traffic on dirt roads, diesel emissions, wood smoke, incinerators or refuse burning, and other surrounding activities. However, no data to show the extent to which these sources of emissions maybe impacting the NAAQS is provided in the NEPA document. We appreciate that air quality is monitored in two of the four wilderness areas within the analysis area every 10 years. If data are available, it would be helpful to include a summary of the results of such monitoring in the FEIS.

#### Potential impacts to biological resources

EPA recommends the FEIS include information on working with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and as appropriate, with the Alaska Department of Fish and Game, including recommended measures to reduce risks and protect biota and habitat discussed in the DEIS. Specifically, the DEIS indicates the proposed project activities may impact federally and state protected species occurring in the project area or vicinity, such as the endangered Steller sea lion western distinct population segment and Snake River sockeye salmon, and threatened fish species including Columbia River coho salmon and steelhead. The impacts are related to the anticipated loss and degradation of suitable habitats and cover; increased sediment delivery to streams and marine environment, resulting in increased turbidity; and higher than optimal noise levels during harvest and quarrying activities that would involve use of explosives and heavy equipment or machinery.<sup>15</sup>

#### Consultation

EPA appreciates USFS consulting with the Alaska State Historic Preservation Office, the Advisory Council on Historic Preservation, and Federally recognized Tribal Governments. We recommend including the outcomes of these consultations in the FEIS.

#### Public participation in this NEPA analysis

EPA appreciates the USFS efforts to involve stakeholders in the project planning to date. In addition, we believe that it would be important for the FEIS to disclose steps that the agency has taken to ensure effective public participation in this project NEPA analysis during the ongoing COVID-19 pandemic.

#### Monitoring and adaptive management

The Project has the potential to impact a variety of resources for 15 years and beyond and many data sources are currently incomplete or unavailable. Therefore, EPA recommends the FEIS:

- \* Include a monitoring program to ensure compliance with all mitigation measures and assess their effectiveness;<sup>16</sup>
- \* Describe the monitoring program and how it will be used as a feedback mechanism for adaptive management, so needed project adjustments can be made to meet environmental objectives throughout its lifespan;
- \* Disclose lessons learned from past practices in developing similar projects, combined with the need to account for new challenges, such as climate change, to help inform the design and management of the currently proposed project; and
- \* Include any new information from recently available data sources, especially if there is more accurate information about sites where timber harvest would occur so that the public is more informed. EPA appreciates plans to use the Light Detection and Ranging or LiDAR system and other geographic data to refine information about existing conditions in the project area and inform project decision-making.