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First name: Molly

Last name: Vaughan

Organization: US EPA

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email: Vaughan.Molly@epa.gov

Phone:

Comments:

EPA Comments on Chugach NF LMP DEIS

Hello,

Attached please find a pdf of the EPA's comments on the Chugach National Forest Land Management Plan Draft EIS. The hard copy will follow by mail. Please let me know if you have any questions regarding our comments.

Regards,

Molly Vaughan

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Molly Vaughan

U.S. Environmental Protection Agency Region 10

Alaska Operations Office

222 W. 7th Avenue #19

Anchorage, AK 99513-7588

907-271-1215

vaughan.molly@epa.gov  
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Dear Ms. Marceron:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement prepared by the U.S. Department of Agriculture Forest Service for revision of the Chugach National Forest Land Management Plan (CEQ No. 20180171; EPA Project Number 15-0066-AFS). Our review was conducted in accordance with the EPA's responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The Forest Service proposes to revise the 2002 Chugach National Forest Land and Resource Management Plan, to guide management of approximately 5.4 million acres of National Forest System lands in southcentral Alaska for the next 15 years. The Draft EIS considers four alternative management scenarios, including no action, which would continue management under the 2002 plan. Action alternatives include changes in the recreation opportunity spectrum, recreation class, travel management, and recommended wilderness area boundaries.

Overall, we find the Draft EIS to be a comprehensive document and the format to be helpful for understanding the context and basis for the proposed revisions to the LMP. The discussion of how needs and issues were used to develop revision topics, as well as the discussion of agents of change as part of the description of the affected environment were very informative. Based on our review, we are providing recommendations below regarding water resources and air quality, which will help to bolster understanding of how existing resource concerns may persist or be altered in the future as a result of the proposed changes.

Water Quality and Water Resource Protection

We recommend that the Final EIS include additional detail regarding existing water quality issues resulting from Forest uses, and how these water quality concerns are likely to change due to the proposed revisions to the LMP. Although existing water quality in the Chugach National Forest is generally good, the Draft EIS discusses several sensitive areas, including watersheds with a water quality Class 2 (Fair - Functioning at Risk) rating, Clean Water Act Section 303(d) listed waterbodies, priority watersheds identified by the Forest Service for restoration actions, and localized impact areas resulting from recreational uses. We recommend that the Final EIS identify and discuss the existing areas of localized water quality impact concerns. We also recommend including additional detail regarding the existing water resource concerns within the Priority Watersheds identified in Table 80.

Some of the major sources of existing human impact to water quality identified in the Draft EIS include bank trampling from recreational fishing use, off highway vehicles and other trail use, and placer mining. While the document states that no major water quality impacts are anticipated from the proposed land management changes, it notes that changes in the recreation opportunity spectrum could result in localized impacts "at points of concentrated use," and that "proper management and use of BMPs and standards and guide lines

would reduce these impacts." We recommend that the Final EIS include analysis and discussion regarding whether existing water quality issues resulting from Forest uses are likely to change with potential revisions to the LMP, including whether existing water quality concerns in heavily used areas will persist or be

exacerbated, and whether any additional points of concentrated use are anticipated to result in water quality concerns. Given the proposed changes in winter motorized use, we recommend that the analysis address whether any potential water quality concerns, including elevated levels of hydrocarbons, may result in areas of heavy snowmobile use.

We also recommend that the Final ECS discuss whether any points of concentrated use that may result in water quality concerns would be located within identified sensitive watersheds, and how they may impact those sensitive resources. Sensitive watersheds include those with existing water quality concerns discussed above, as well as Source Water Protection Areas for drinking water. According to the Draft EIS, the Forest supplies water for more than 150 public water systems; therefore, protection of public drinking water

supplies is a critical function of the LMP. Finally, we recommend that the Final EIS include additional detail regarding specific best management practices, standards and guidelines, and other tools available to reduce any anticipated impacts.

Air Quality

Regarding potential regional haze concerns, the document states, "Cruise ships in the College Fjord and Prince William Sound are expected to continue to reduce visibility in the areas and the Nellie Juan-College Fjord wilderness study area and may impede successful implementation of the state regional haze plan (USDA 2014a)." We recommend that the Final EIS discuss whether the Forest Service intends to perform any future monitoring of this concern, similar to that conducted in 2012. We additionally recommend that the Forest Service consider discussing with relevant stakeholders whether any best management practices are available that would reduce visibility impacts from cruise ships.

The Draft EIS also discusses previous air quality monitoring conducted in Turnagain Pass to assess whether concentrated snowmobile use was resulting in air quality concerns. We similarly recommend that the Final EIS discuss whether any additional monitoring of air quality in heavily used snowmobile areas is warranted, given proposed changes in winter motorized use designations.

Effective October 22, 2018, EPA will no longer include ratings in our comment letters. Information about this change and EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepa/environmental-impact-statement-rating-svstem-criteria>.

We appreciate the opportunity to review the Draft EIS for the Chugach National Forest Land Management Plan. We hope that our recommendations for the Final EIS help to ensure a robust NEPA analysis, and clear understanding of anticipated future air quality and water quality conditions. If you have questions concerning our comments, please contact Molly Vaughan of my staff in Anchorage, at (907) 271-1215 or

vaughan.molly@epa.gov, or you may contact me at (206) 553-1841 or nogi.jill@epa.gov.