SAR - DEIS - Chapter 3 - Physical - Water

Comment #	Comment
0029048-003	I have visited Cordova more than any place in Alaska because of the diversity of the wetlands.
0029063-043	Fisheries The Draft EIS states that several past gravel operations have been used to create ponds for fisheries enhancement (page 3-38). Heavy equipment, vehicles, and other machinery are typically staged in or aroumd such areas. Equipment can contribute to incremental releases of hydrocarbons through chronic or passive leaks or as a result of line breaks. Such releases could potentially contribute to surface and ground water contamination and may adversely affect fish and other aquatic resources. It is unclear from this assessment if the USFS conducted chemical analyses to determine if contaminants were present before fish were allowed to enter the reclaimed area, and what measures will be required for future "ponds." Most importantly, th ; USFS should detail how successful such activities have been, and should develop definable (- :.~- measurable forest-wide Standards amd Guidelines and mamagement prescriptions to address such \ practices and ensure that fishery goals are met, or where they are not, to provide for subsequent J modifications to better meet these goals. This will ensure forest-wide consistency with implementation and ensure water quality, and fish and macroinvertebrate populations are adequately protected.
0029063-044	Implementation of Best Management Practices (BMPs) for road construction and other forest activities may not ensure that the Alaska Water Quality standards will be met. A report to Congress, Anadromous Fish Habitat Assessment (1995), concluded that BMPs employed across the Tongass National Forest were inconsistently applied and failed to adequately protect water quality and fish habitat. The Draf EIS did not indicate if BMPs have been closely reviewed and what measures have been employed to ensure they are correctly and consistently applied across the CNF. We suggest the Final EIS correct this oversight and include in the discussion: techniques utilized, areas represented, attributes being monitored and resulting trends

Comment #	*Comment*
0029063-046	SubtidaUestuaries/wetlamds There are approximately 2,219,497 acres of subtidal, deepwate estuarine, and marine wetlands (i.e., PWS and Turnagain Arm) within the CNF legislativ boundaries. The USFS states it does not generally manage these wetlands. While in many case there has been an understamding to agree to disagree on ownership of submerged lands betwee federal land management agencies and the State of Alaska (State), the 1992 Memorandum o Understanding developed between the State and the USFS established that the State woul manage ffom the current mean high tideline seaward. It is our understanding that the Turnagai Arm and Chickaloon Bay tidelands are within the CNF. In 1980, ANILCA transferred thc India Creek area and the eastern portion of the Chickaloon estuary of the CNF to the Kenai NWR These areas and the remainder of the Chickaloon estuary were later recommended for Wildemes designation by the Reffige's Comprehensive Conservation Plan, primarily to protect it outstanding wildlife values. The CNF lands tramsferred in 1980, and the subsequent Wildernes proposal included lands down to the mean high water The mud flats and intertidal area remaining in CNF between the Refuge lamds ffom mean hig water upland and the historical CNF boundary at low water are critical wildlife habitat that ar essential for migratory bird feeding and resting and to upland wildlife that feed and travel alon the intertidal areas. The Chickaloon Bay portion of these shared resource valUes were formall recognized by Kenai NWR, CNF, Alaska Departments of Fish amd Game, and Alask Department of Natural Resources (ADNR) in a 1972 Memorandum of Understanding (MOU). I appears consistent with the 1972 MOU amd recent CNF-ADNR MOU to include within the fina altemative an appropriate color codedUnumbered mamagement unit for these forest tidelamds. A additional 6 miles of intertidal estuary within CNF ffom Bumt Island to /~ mile east of Johnso Creek along Turnagain Arm is also directly adjacent to the Refuge Wildemess proposal and wa not originally included in the MOU lamds. These lands should be provided the same level o protection as those lands defined under the MOU and identified and evaluated in the Final EIS We recommend that all of the Chickaloon Bay tidelands be prescribed the most protective ,~ ;` management prescription possible to protect this extremely valuable resource. A Supreme Court decision (U.S. vs Alaska), in 1997, concluded that federal withdrawals or proclamations were adequate to demonstrate federal intent to retain submerged lands, provided the submerged lands were required to fulfill federal management purposes. The USFS is encouraged to provide oversight to ensure measures are in place so that long-temm viability of ~ subtidal, deep estuarine, and marine habitats within the CNF boumdaries are not compromised. A multi-agency task force may be a vehicle in which to establish parameters for evaluating activities amd for monitoring impacts. We believe that if these areas are not adequately protected over time, viability of these aquatic ecosystems may be severely compromised.
0029063-048	Water Ouality Page 3-27, Surface Water Quality; and Page 3-29, Groundwater Sections: we concur with Draft EIS statements that water pollutants, such as petroleum and other lubricants, as well as hardrock mining acid drainage, can be of concem. USFS audits have found elevate / levels of trace and heavy metals (mercury) in several old hard rock mines. In view of thi / infommation, the Final EIS should explain the conclusion included here that past management e~,9 ~ ~ activities have not adversely affected groundwater. The Final EIS should include the type and ~ IA level of analysis the USFS has conducted to date, including the nurnber of surface and C ~ c (C gro~ndwater sites sampled and trends. According to the Draft EIS, the number or level of mining `9 ~ u~ operations will not vary by altemative. Because most past mining operations have been t3tc~ ~ c~L concentrated on the Kenai Peninsula and most likely, this trend will continue, diluted by appearing to apply on a Forest-wide scale. The Final EIS should address this issue in detail. Best Management Practices (BMPs) We recommend the Final EIS discuss how well, or to what extent, BMPs are being implemented across the CNF and to what extent they are effective in protecting waterbodies. The Draft EIS lacks meaningful discussion of results ffom past and ongoing annual BMP Monitoring Reports. It is unclear in the analysis if BMPs are consistently |),;` v'c: applied CNF-wide and what the BMP effectiveness monitoring results are to date.

Comment #	*Comment*
0029063-054	Page 3-26. Lines 724-729 The CNF is subdivided into 94 watershed associations. These watersheds ramge in size ffom about 30-240 square miles, and are about the size of 5th level watersheds under the Natural Resources Conservation Service (NRCS) national program. According to NRCS, a 5th level sub-watershed ranges from 3,000-40,000 acres. NRCS also indicated that initially its Hydrologic Unit Code (HUC) was not implemented in Alaska because the cost in time amd money was extremely high. However, according to NRCS, all federal agencies are now required to do their planning based on hydrologic units. In addition, NRCS ~) indicated that the USFS system, at the present, may not meet the national guidelines established ~ ~c (pers. comm. H. Cook, NRCS). We believe this issue needs further discussion in the Final EIS~ Page 3-38, Lines 1240-1242 Placer miners are required in some cases to use settling ponds, and to rehabilitate and revegetate mined areas. We suggest the Final EIS describe the level of compliance the USFS has obtained from placer miners to date and describe how management Standards and Guidelines could be revised in the future to ensure measures are being monitored (> ~,~ and standards are being met so as to mitigate adverse impacts. .) h¢~c~
0028328-012	Finally, we believe an EIS level cumulative analysis must include baseline data in order to more adequately assess projected impacts. ACE has repeatedly requested a forestwide environmental assessment be done for contamination as a result of mining activity. In light of new infonnation, specifieally, PCB contamination of Kenai Lake and possible mercury contamination of Cooper Lake leads us to modify the scope of the assessment. The FEIS should include a forestwide environmental assessment of all known and potential contaminated sites. Abandoned mining sites need to be assessed and then cleaned up.
0028328-016	Water[Riparian/Wetlands: Numerous laws regulate the health of our nation's water resources. Among them are The Organic Administration Act, which mandates watershed management and The Clean Water Act, which, among other things, requires control of nonpoint source water polluhon and control of discharge of pollutants into waters of the U.S. Again, certain key indicators are missing if the Forest Service is to ensure management achvities do not damage water sources. For example, two stroke engines are highly polluhng, discharging up to one third of their raw fuels into the ecosystem. With heavy snowrnachine use, this can be disastrous come springtime as these fuels leach into aquifers and streams with the melting snows. In addition, snowmobile uses compacts snow, which can impact vegetation productivity and growth. We recommend adding the following key indicators: I) Numbers and types of visitor days and 2) Acres open to off road motorized use, to include helicopters.
0034420-003	Upper Tributaries continued Upper tributaries are insurance policies for increased system carrying capacity; temperature regulators, chemical, biological and physical water quality filtration systems yet are little protected by regulation.
0034823-002	Please especially protect wetland areas such as the Copper River Delta and other riparian corridors.
0034891-003	3. Water. Particulate air pollution from snowmachines in the form of unburned fuel is likely to precipitate and be trapped in the snowpack. When cumulated over a winter season, the snowmelt in spring could contain the equivalent of hundreds of gallons of fuel spilled in certain wetland areas and streams. The DEIS omits mention of this significant source of water pollution.

Comment #	*Comment*
0034894-010	We request a careful analysis of the impacts to fisheries and water quality of the proposed alternatives in the EIS. One of the most important values of roadless areas is the high-quality water and fish habitat found in them. They are often important to the protection of watersheds, including those that provide drinking water, in addition, stronghold watersheds, where some of the healthiest populations of native fish are located, are in roadless areas. Ground disturbing activities, including road construction, logging, mining, oil and gas development, and off-road vehicle use significantly increase sedimentation, water flows, and stream temperatures, in addition, these activities increase erosion, as well as the frequency and severity of flooding and landslides. The detrimental impact of the resulting sedimentation and water temperature increases on native fish populations, including bull trout and salmon, is well documented. The EIS should consider the critical role of roadless areas in the survival and recovery of native fish populations.
0034895-004	I strongly urge you add more areas with high-productivity habitat types including low elevation and riparian forests.
0034929-013	The many possible adverse consequences of this sort of recreation management, particularly on wetlands and riparian areas, are detailed on page 3-37 of the DEIS.
0036573-005	Some issues have not been adequately studied by the EIS, including the direct and cumulative impacts of a number of types of developments that threaten the Copper River Delta and other shorelines of the Chugach National Forest. The existing TAPS tanker terminal at Valdez already poses a long-term threat to the area from major and chronic oil spills. Have these spill trajectories been modeled to see what insult to injury might follow in the event of another spill like the Exxon Valdez? Cruise ship traffic, including oil spills, water and air pollution, contaminated sites, and associated demands for disruptive helicopter tours and other high impact operations should be analyzed and GIS is a good tool for beginning this process. New threats include extraction of coal or oil at Katalla, offshore oil and gas exploration and development, mining, and clearcut mining.
0036574-007	1/ Please note that CMC signed onto the comments submitted by Trustees for Alaska specifically regarding the Forest Serviced failure to address significant impacts to and management of the tidelands and submerged lands that are part of the Chugach National Forest.