

Responses to Comments

Appendix B

Ernestine Hanlon
P.O. Box 358
Hoonah, Alaska 99828
907/945-3666

RECEIVED NOV 29 2007

November 19, 2007

U.S. Forest Service
Hoonah Ranger
Hoonah, Alaska 99829

RE: Iyouktug Timber Sale

To All this Concerns,

EH-1 | The USFS is proposing to offer up to 59.8 MMBF in timber through the Iyouktug timber sale near already over-harvested Hoonah, Alaska. Putting this in number perspective, the proposed volume is almost twice the amount needed to supply local mills in Hoonah for the next 10 years.

EH-2 | Already the Forest Service now predicts that the deer will decline to the point where deer hunting may be restricted because of the heavy loss of deer habitat from past logging and last year's severe winter that lasted for five full months. In the area of the area of Iyouktug timber sale, forty seven (47) percent of prime deer winter habitat has been lost through past logging.

This is a pretty harsh history for the small village of Hoonah that depends on the wildlife sustained through a healthy habitat.

EH-3 | As a Tlingit spruce root basket weaver, I used to gather perfect spruce roots at an estuary near Hoonah. Although the area I am referring to is not logged out, the cumulative effects have changed the ground and made it drier resulting in a different vegetation. Now, I need to go further away to gather good spruce roots because the ones growing at near by estuaries are more brittle and break easy resulting in low quality, short roots.

EH-4 | I am opposed to any more logging. It has been only twenty five years since aggressive logging has begun around Hoonah. We need a thorough objective study of private and federal lands of the resulting negative effects this type of logging has left behind. We live and feel every negative affect today.

Please, no more watershed loss. No more fish creek loss. No more deer and bear habitat loss. No more wildlife ecosystem loss. No more human losses.

Our Tlingit way of life will continue what little we have left now for our grandchildren into the future.

Sincerely,

Ernestine Hanlon

Responses to EH – Ernestine Hanlon

EH-1 – The timber industry in Southeast Alaska needs to be considered on a more regional scale than on a community by community basis. The purpose of the Iyouktug Timber Sale includes serving the existing timber operators in Hoonah as well as other users of Southeast Alaska timber both existing and potential. Looking at only supplying the current need eliminates the possibility of any future expansion for the timber industry.

EH-2 - The DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species and Other Wildlife and Subsistence sections, Sitka Black-tailed Deer portion, address the impacts to deer winter habitat and to hunting. This section confirms your statement that subsistence hunting would be affected by the proposed project.

EH-3 – The DEIS and FEIS alternative maps in Chapter 2 show the distance from estuaries to the project area. The Chapter 2, Activities and Design Elements Common to All Action Alternatives, Beach and Estuary Fringe section clarifies that no harvest or roads are proposed in beach or estuary fringe. We do not expect cumulative watershed effects to result in changes in downstream vegetation in the Iyouktug project area.

EH-4 – We considered a no action alternative that proposes no harvest in the project area (Chapters 2 and 3). Please also see the response to BC-25.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

November 19, 2007

Reply To: ETPA-088

Ref: 07-054-AFS

Hans von Rekowski, IDT Leader
Sitka Ranger District, Tongass National Forest
204 Siginaka Way
Sitka, Alaska 99835

Dear Mr. von Rekowski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) (CEQ No. 20070406) for the Iyouktug Timber Sales project on the Hoonah Ranger District, Tongass National Forest, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. This Section specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policy and procedures, we also review the adequacy of the draft document in meeting procedural and public disclosure requirements of NEPA.

The draft EIS proposes a no action and four action alternatives. Alternative 2 is the proposed action and Alternative 3 is the preferred alternative. According to the draft EIS, Alternative 2 maximizes timber harvest in the Iyouktug project area; Alternative 3 minimizes impacts to deer habitat, connectivity, and also minimizes effects to roadless characteristics in roadless areas while providing for economic timber supply; Alternative 4 minimizes impacts to the roadless character of Iyouktug's roadless areas; and Alternative 5 maximizes the economic return of timber harvest in the project area.

EPA-1
EPA has rated the draft EIS as EC-2 (Environmental Concerns-Insufficient Information) due to concerns regarding potential impacts to water quality and wetlands. We recommend that the final EIS include additional information about the affected resources and mitigation measures to avoid or compensate for impacts. An explanation of the EPA rating system is attached to this letter. The rating and a summary of our comments will be published in the Federal Register.

The draft EIS includes a good discussion of potential water quality impacts, including potential increased temperature due to harvest and potential increased sediment due to roads and stream crossings, such as the Middle Iyouktug and Suntaheen watersheds. However the document does not indicate whether any waters in the project area are listed on Alaska's 303(d) list or whether the project will contribute to exceedences of water quality standards. Section 303(d) of the Clean Water Act (CWA) requires identification of those water bodies which are not meeting or not likely to meet State water quality standards. The EIS should report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether the Alaska Department of Environmental Conservation (ADEC) has developed a water quality restoration plan (Total Maximum Daily Load) for the waterbodies and the

EPA-1
(cont.)

pollutants of concern, if applicable. If a Total Maximum Daily Load (TMDL) has not been established for those water bodies on the 303(d) list, then in the interim until one is established, the EIS should demonstrate that there will be no net degradation of water quality to these listed waters. The DEIS discusses the potential for sediment loading, but not in terms of meeting or exceeding water quality standards. We recommend that the final EIS include such a discussion along with mitigation measures. We also recommend that the final EIS include a discussion about potential impacts of sediment on wetlands and associated mitigation measures.

EPA-2

EPA commends the US Forest Service (FS) for consulting with tribal governments and incorporating their concerns into the modifications of the alternatives. The draft EIS is well-written and informative. The maps, tables, and summary charts are helpful tools for comparing the alternatives.

EPA-3

Thank you for the opportunity to comment on this draft EIS. If you would like to discuss our response further, please contact Fatima Bukhari, at (907) 271-1481 or via electronic mail at bukhari.fatima@epa.gov or me at (206) 553- 1601.

Sincerely,



Christine Reichgott, Manager
NEPA Review Unit

Enclosures

**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.

Responses to EPA – Christine Reichgott, United States Environmental Protection Agency (EPA)

EPA-1 – EPA’s rating of the Draft EIS as Environmental Concerns – Inadequate Information (EC-2) and your request that additional information and mitigation measures to address these concerns be added to our EIS is noted.

We feel the analysis within the Water Quality, Fisheries and Wetlands sections located in Chapter 3 adequately describe the potential impacts relating from this proposed project. Furthermore, we feel the design measures described in unit and road cards in Appendix B and C of the DEIS and also in the project record, including the implementation of Best Management Practices (BMPs) are expected to maintain water quality within standards established by the State of Alaska.

Additionally, EPA’s comment about the lack information on water quality limited water bodies (303d listing) is also noted. Currently, the only water body within the project area listed on Alaska’s 303(d) list is the Long Island MAF (referred to by the State as the East Port Fredrick LTF). The listing of this water body and its status has been added to the Water Quality section of the FEIS. See also DEC-2 for more discussion on this topic.

EPA 2 - EPA’s concern for potential sediment loading in terms of meeting or exceeding water quality (WQ) standards is noted. EPA’s primary concern is the potential cumulative adverse impacts in water quality and high quality salmon fisheries from this project.

The DEIS and FEIS conclude that BMP implementation is expected to maintain water quality with standards established by the State of Alaska. While short-term, local sedimentation is likely during the replacement of pre-existing stream crossing structures and during installation of new road segments and stream crossing structures, properly placed and maintained structures affect only the local channel segment and are expected to be minor. Additionally, fish stream crossings will be bridged to minimize channel disturbance.

The site-specific application of BMPs, with a monitoring and feedback mechanism, is the approved strategy for controlling nonpoint source pollution as defined by Alaska’s Nonpoint Source Pollution Control Strategy (Alaska Department of Environmental Conservation (DEC) 2007). In 1997, the State approved the BMPs in the Forest Service’s Soil and Water Conservation Handbook (FSH Handbook 2509.22, R10 Supplement, October 1996) as consistent with the Alaska Forest Resources and Practices Regulations. We are using the most current BMPs (USDA Forest Service 2006d). The DEIS and FEIS conclude that water quality effects will be temporary and localized, will be minimized by the application of BMPs (shown site-specifically in unit and road cards in the ROD), and will not impair existing or designated uses or exceed State Water Quality Standards. Forest-wide BMP implementation monitoring results indicate a high rate of successful BMP implementation. We continue to work cooperatively with the State of Alaska to develop and apply water quality monitoring protocols.

See response to EPA-1 above for additional information on mitigation and design measures.

EPA-3 - Thank you for your review and comments.

11/20/07

I.D.T. Team Leader
 Sitka Ranger District
 Tongass National Forest

Attn: Iyouktug Timber Sale EIS

ISES-1

Thank you for the opportunity to comment on the subject document. I applaud the USFS effort to provide a ten-year supply of timber for the Hoonah mills and sympathize with the difficulty of your task, given the catastrophic (and continuing) overharvest on NE Chichagof. If this sale is necessary for a ten-year supply, I can't imagine where the timber is going to come from in the decades to come. The fact that 20% of this sale is comprised of mountain hemlock indicates the degree to which you are reaching into the bottom of the barrel even now. However, since I have no concrete suggestions to ameliorate this, I will spare you further hand-wringing.

ISES-2

I will restrict my specific comments to your harvest plans for yellow cedar, whose ecology I have been personally interested in for my 40 years of residence in northern SE Alaska. The project area contains a considerable volume of cedar that is not undergoing the decline so prominent farther south. This is a very conservative, long-lived species whose recruitment is slow and sporadic under natural conditions, and for which there is no known practical way of increasing recruitment silviculturally. I believe these facts confer a particular responsibility on the USFS to harvest cedar very conservatively and generally attend to its persistence in the next generation of forest. The present plan to some degree does the opposite, targeting units with high proportions of cedar and emphasizing this species in selective cut units. The short-term economic rationale for this is evident, but I strongly believe this to be both ecologically and economically irresponsible in the long term.

ISES-3

Your plan to leave large, defective individuals and protect young cedars during harvest are good steps in the right direction but are in my view insufficient as an overall conservation plan. Please consider adding the following stipulations:

- Before harvest is allowed in a unit, all cedars greater than 3ft DBH will be marked for retention and provided with a sufficient buffer against windthrow (These large trees are often over a millennium old; they provide an important ecological presence in the forest and a continuing seed source);
- Units with 10% basal area of cedar will be removed from consideration for clear-cutting (Cedars recruit especially poorly under these conditions).

ISES-4

Thank you for considering my views.

Sincerely,

Gregory P. Streveler
 Chief Scientist
 Icy Strait Environmental Services
 Box 94, Gustavus, Ak, 99826

Responses to ISES-- Gregory P. Streveler, Icy Strait Environmental Services

ISES-1 - We are providing timber from the suitable and available timber base within development LUDs in the project area. Please see Chapter 3, Silviculture and Vegetation section, Chart 3SV-1.

ISES-2 – Please see responses to BC-22 and BC-23. In addition, yellow-cedar third-year seedling survival percentages following planting on the Tongass from 1994 to 2001 have ranged from 67 to 92 percent with a weighed average of 84 percent. Silvicultural prescriptions will specify yellow-cedar planting in specific clearcut units and larger openings within some single tree selection units to increase yellow-cedar composition. Please see FEIS, Chapter 3, Affected Environment for Forest Vegetation and Species Composition.

ISES-3 - Please see response to BC-23.

ISES-4 – We considered your recommendation to avoid clearcutting units with more than 10% basal area of cedar. However, the prescriptions as proposed in the FEIS will adequately provide for yellow-cedar regeneration in clearcut units. Yellow-cedar is intolerant of shade and can successfully regenerate naturally following clearcut harvest and larger openings created through single tree selection harvest (Deal 2006).



"Greg Strevler"
<grigori@gustavus.ak.us>
s>

To: <comments-alaska-tongass-hoonah@fs.fed.us>
cc: <erika@seacc.org>
Subject: Iyouktug EIS comment

11/19/2007 03:41 PM

IDT Leader -

Attached is my comment on the Iyouktug EIS.

- Judy Brakel

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.503 / Virus Database: 269.15.33/1132 - Release Date: 11/15/2007
9:34 AM



Iyouktug Timber sale comments.doc

11/20/07

I.D.T. Team Leader
 Sitka Ranger District
 Tongass National Forest

Attn: Iyouktug Timber Sale EIS

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JB-4

Thank you for considering my views.

Sincerely,

Gregory P. Streveler
 Chief Scientist
 Icy Strait Environmental Services
 Box 94, Gustavus, Ak, 99826

Responses to JB – Judy Brakel

JB-1 - Please see response to ISES-1.

JB-2 - Please see response to ISES-2.

JB-3 - Please see response to ISES-3.

JB-4 - Please see response to ISES-4.