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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

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DSC-P

September 13, 2006

Reply To
Attn Of: ETPA-088

Ref: 01-043-NPS

Carla McConnell
Olympic National Park- GMP
National Park Service
Denver Service Center- Planning
P.O. Box 25287
Denver, CO 80225

Dear Ms. McConnell:

The U.S. Environmental Protection Agency (EPA) has completed its review of the draft Environmental Impact Statement (DEIS) for the **Olympic National Park Draft General Management Plan** (CEQ 20060239) in accordance with our authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

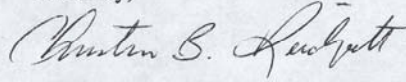
The draft EIS evaluates four alternatives. Alternative A is the no-action alternative or continued management for project area; Alternative B emphasizes cultural and natural resource protection. Alternative C would include a boundary adjustment in the Ozette area. And Alternative D is the agency Preferred Alternative and emphasizes protecting natural and cultural resources while improving visitor experiences.

EPA has assigned a rating of LO (Lack of Objection) to the Preferred Alternative. Our rating and a summary of our comments will be published in the *Federal Register*. We support the Preferred Alternative to protect natural resources and we feel that it balances the various zones by providing access and preserving backcountry opportunities. However, we have some suggestions with improving the document.

The descriptions and analyses of potential impacts in the EIS are based on qualitative information. We recommend providing quantitative information to assess the current condition so that there is a better means to measure and predict impacts to water quality (i.e. sediment, temperature, and possible 303(d) listing), air quality, fish and wildlife etc. This would provide data and an additional basis to monitor and evaluate management. An example where the document does provide quantitative data is in the section on mountain goats, which includes an aerial survey and population estimate. We recommend the Final EIS provide this type of information and discuss potential resources to collect data where there may be gaps.

Thank you for the opportunity to comment on the draft EIS. A copy of the rating system used in conducting our review is enclosed for your reference. Please feel free to contact Lynne McWhorter at (206) 553-0205 with any question that you have.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine B. Reichgott".

Christine Reichgott, Manager
NEPA Review Unit

Enclosure

**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.