UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 11, 2011

Alice B. Carlton, Forest Supervisor
Plumas National Forest
159 Lawrence Street
PO Box 11500
Quincy, CA 95971-6025

Subject: Final Environmental Impact Statement for the Concow Hazardous Fuels Reduction Project, Butte County, California (CEQ# 20110000).

Dear Ms. Carlton:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Concow Hazardous Fuels Reduction Project (Project). Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA previously reviewed the Draft Environmental Impact Statement (DEIS) for the Project and provided comments on November 8, 2010. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2), based on our concerns regarding water quality, timber extraction methods and climate change. We thank the Forest Service for its responses to EPA's comments, including providing additional information regarding the Butte Unit Community Wildfire Protection Plans.

EPA has remaining concerns with regard to possible adverse effects on water quality. We recommend the Record of Decision (ROD) include a detailed inventory of stream crossings, such as culverts, bridges, and low water crossings that will be utilized by heavy equipment, including bulldozers, track hoes, mastication equipment, and logging trucks. This inventory should give an estimate of the degree and scope of anticipated erosion, describe the expected wear and tear from heavy equipment on constructed stream crossings, and specify the road stabilization methods that will be used to mitigate and reduce potential for impacts to aquatic features and water quality.

The FEIS states that 4.25 miles of temporary roads construction would be required for preferred/proposed Alternative B, while Alternative C would not need any temporary roads (Appendix Table 1). We continue to believe that Alternative C would be the environmentally preferable alternative, and recommend that it be identified as such in the ROD. We also recommend that the ROD provide a detailed closure and restoration plan for skid trails and any temporary roads that are constructed. This plan should include specific information on whether

these roads and trails would be recontoured, replanted with appropriate vegetation, monitored, and closed to on-highway vehicles as well as off-highway vehicles. We encourage the Plumas National Forest (Forest) to include a specific post-harvest schedule for closure of the temporary roads.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or munson.james@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

cc: Karen Hayden, District Ranger, Plumas National Forest
Carol Spinos, Senior NEPA Planner, Plumas National Forest
Steve Anderson, Field Manager, Bureau of Land Management