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

September 27, 2007

Edward C. Monnig, Forest Supervisor
Humboldt-Toiyabe National Forest
1200 Franklin Way
Sparks, NV 89431

Subject: White Pine & Grant-Quinn Oil and Gas Leasing Project Final Environmental Impact Statement (EIS) [CEQ #20070380]

Dear Mr. Monnig:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

In our October 11, 2005, comment letter regarding the Draft EIS, we expressed concerns that the proposed project could have significant adverse impacts to watershed resources, including water quality and habitat. We stated that the Draft EIS did not contain sufficient information regarding lease stipulations to ensure these resources, and others such as air quality, would be protected. We, therefore, recommended the Final EIS identify and commit to appropriate mitigation measures such as best management practices to reduce soil erosion, sedimentation, oil and hazardous substance spills, and dust and diesel emissions. In addition, we recommended the Final EIS identify and commit to the best management practices that would be applied to all roads and pipelines on the forest which are associated with, but are not necessarily on, the authorized lease areas. We continue to have concerns about the proposed oil and gas leasing program because the Forest Service has deferred commitment to best management practices and other mitigation measures until tiered project-specific NEPA documents are prepared.

The direct, indirect, and cumulative impacts of the proposed oil and gas leasing program should be fully considered in the decision regarding where and under what conditions to allow leasing in the White Pine and Grant-Quinn project area. EPA recommends that the Record of Decision (ROD) commit to appropriate best management practices as lease stipulations. We also recommend that tiered project-specific NEPA documents for oil and gas leasing in the project area include all appropriate mitigation measures to ensure all environmental resources will be protected.

We appreciate the opportunity to review this Final EIS. Please send us a copy of the ROD when it becomes available. If you have any questions, please call me at (415) 972-3846, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Nova Blazej, Manager
Environmental Review Office

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