UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUL 20 2009

Alice B. Carlton
Forest Supervisor
P.O. Box 11500
159 Lawrence Street
Quincy, CA 95971

Subject: Revised Final Environmental Impact Statement (RFEIS) for the Moonlight and Wheeler Fires Recovery and Restoration Project (CEQ# 20090194)

Dear Ms. Carlton:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document. 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 our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Plumas National Forest on August 18, 2008. We rated the DEIS as Environmental Objections – Insufficient Information (EO-2) based on our concerns about the scale of the project and adverse impacts to already damaged watersheds. EPA also reviewed the Revised Draft Environmental Impact Statement (RDEIS) and provided comments on April 6, 2009. We rated the RDEIS as Environmental Concerns - Insufficient Information (EC-2), again expressing concerns regarding adverse impacts to already damaged watersheds.

We appreciate the Forest Service's attention to our previous comments, several of which are addressed in the RFEIS. EPA supports the Forest Service's goal of encouraging recovery of the forest ecosystem and fire-damaged watersheds as soon as possible. We recognize the need to reforest in order to stabilize the soil and prevent soil loss from debris flows and mudflows, and understand the desire to harvest fire-killed trees while there is sufficient timber value to fund needed restoration efforts. Nevertheless, we remain concerned about the impacts to project area watersheds from the preferred alternative. EPA continues to recommend that the Forest Service minimize adverse impacts to already damaged watersheds. In particular, we urge careful consideration of the quantity and location of temporary roads, landings, and skid trails in order to minimize adverse effects on water quality and watersheds already at high risk of Cumulative Watershed Effects (CWE). We continue to recommend that the Forest Service avoid California spotted owl (CSO) Home Range Core Areas (HRCAs) and

Protected Activity Centers (PACs), minimize new road construction, and use all practical methods to minimize emissions during construction. We also encourage the Forest Service to include, in the Record of Decision (ROD), a specific post-harvest schedule and timeline for closure of the temporary roads and landings. Lastly, EPA suggests that the ROD include a description of climate change and its implications for successful reforestation. The Response to Comments indicates that the Forest Service has addressed our previous comment on this subject; however, we were unable to locate any such discussion in the RFEIS.

We appreciate the opportunity to review this RFEIS. We are available to discuss our comments. If you have any questions, please contact Jennifer Gagnon, the lead reviewer for this project, at (415) 947-4121 or Gagnon.Jennifer@epa.gov, or me at (415) 972-3521.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

cc: Central Valley Regional Water Quality Control Board