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

August 2, 2012

Lisa Roberts
National Marine Fisheries Service
1655 Heindon Road
Arcata, CA 95521

Jennifer Jones
Fish and Wildlife Service
1829 South Oregon Street
Yreka, CA 96097

Subject: Final Environmental Impact Statement for the Fruit Growers Supply Company's Multispecies Habitat Conservation Plan (CEQ# 20120192).

Dear Ms. Roberts and Ms. Jones:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Fruit Growers Supply Company's Multispecies Habitat Conservation Plan Project, (Project). Our review and comments are pursuant to the National Environmental Policy Act, Council on Environmental Quality 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 Fish and Wildlife Service and the National Marine Fisheries Service (Services) on February 11 2010. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding adverse impacts to water resources, watershed indicators, timing of road decommissioning and maintenance, response to flooding, financially sustainable forest management, air quality, and climate change.

EPA continues to have concerns regarding adverse impacts to water quality and the Klamath Watershed from the project. In addition, EPA supports the comments and recommendations in response to the DEIS that were provided by the North Coast Regional Water Quality Control Board (Regional Board) in their letter to the Services dated February 11, 2010. We continue to urge the Project Proponent, as well as the Services, to engage the Regional Board staff early in the process of Project design and development of HCP activities to ensure that Project operations will be in compliance with the North Coast Basin Plan, California's Porter-Cologne Act, the federal Clean Water Act, and the final Total Maximum Daily Loads (TMDLs) for the Klamath, Scott, and Shasta Rivers.

We appreciate the opportunity to review this Final EIS. Should you have any questions regarding our comments, 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,

Connell Dunning

FOR Kathleen Martyn Goforth, Manager
Environmental Review Office

cc: Maggie Robinson
North Coast Regional Water Quality
Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403-1072