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

June 1, 2009

Bobbie A. DiMonte
Ecosystem Planning & Coordination
Shasta-Trinity National Forest
3644 Avtech Parkway
Redding, CA 96002

Subject: Final Environmental Impact Statement (FEIS) for the Gemmill Thin Project, Shasta-Trinity National Forest, Trinity County, California (CEQ#20080370)

Dear Ms. DiMonte:

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 NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

Actions are proposed on approximately 1,618 acres of Shasta-Trinity National Forest lands. Proposed actions include: (1) thinning from below in mixed conifer late-successional stands, with associated post-harvest fuel reduction treatments; and (2) other fuel reduction activities in plantations, fuelbreaks, and fuel buffers. EPA recognizes the ecological significance and unique environmental issues of Shasta-Trinity National Forest. We acknowledge the importance of the project goals to reduce the risk of habitat loss due to wildfire and to promote the development of contiguous old growth habitat.

We rated the Draft EIS as Environmental Concerns – Insufficient Information (EC-2) due to (1) the need for additional information on the criteria used for specific harvest prescriptions under each action alternative; (2) air quality mitigation measures; and (3) community impacts.

EPA appreciates the verification in the Final EIS that Trinity County and surrounding areas are in attainment for all criteria pollutants under NAAQS. We also appreciate the additional discussion of several issues of concern to EPA, including community impacts and potential environmental justice issues, climate change, and the amended Forest Plan.

The Forest Service confirmed that a small portion of the project will occur on land with Naturally Occurring Asbestos, and EPA appreciates the Forest Service's commitment to take appropriate mitigation measures to protect human health as outlined by the California Air Resources Board.

Our remaining concern deals with the criteria for determining which trees constitute the largest and healthiest in the forest and, thus, will not be removed as part of the thinning project.

EPA continues to encourage the Forest Service to clarify the metrics it will use and decision-making process for making these determinations.

Thank you for the opportunity to review this FEIS. If you have any questions, please call me at (415) 972-3521, or contact Britta Johnson, the lead reviewer for this project. Britta can be reached at (415) 947-4121 or johnson.britta@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)