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

June 16, 2008

Kit Mullen
Hat Creek District Ranger
Lassen National Forest
43225 E. Hwy 299
P.O. Box 220
Fall River Mills, CA. 96928

Subject: Final Environmental Impact Statement (FEIS) for the North 49 Forest Health Recovery Project (CEQ# 20080176)

Dear Mr. Mullen:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document 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. We thank Alissa Tanner, Interdisciplinary Team Leader, for the informal extension to the comment deadline date of June 9, 2008.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for the North 49 Forest Health Recovery Project and provided comments on May 25, 2006. We rated the DEIS as Environmental Concerns-Insufficient Information (EC-2), due to concerns with potential impacts to water quality, grazing, and late-successional wildlife species. We also recommended the FEIS include additional information on associated Wildland Urban Interfaces, monitoring, and mitigation.

EPA commends the development of Alternative 7, the Preferred Alternative, which provides for additional retention of late-seral habitat while addressing the need to improve fire-resiliency, forest health, and ecological diversity. Of note are unique project prescriptions, such as the diversity thin, which includes structural thinning of the general matrix, radial release of large diameter overstory trees, and retention islands (15% of a stand with no treatment) (p. 24). This prescription would provide for greater saw timber and biomass revenues while reducing the adverse effects on existing late seral habitat. The use of natural fire barriers and existing thinned areas in the design of the Defensible Fuel Profile Zones (DFPZ) is also notable because the new alignment reduces impacts to late seral habitat and travel corridors of furbearers such as the American marten (p. ROD-9).

These unique features of Alternative 7 may be transferable to other Sierra Nevada forests; extending the water quality, forest health and ecological diversity benefits of retaining existing late seral habitat. We recommend a firm commitment to monitor the effectiveness of these unique management prescriptions and, if anticipated benefits are confirmed, active transfer of these management methods to other forests with similar management needs.

We also appreciate the development of Alternative 7 in response to public concerns and the additional information included in the FEIS in response to our comments. While we continue to have concerns with the cumulative effects of establishing the DFPZ network and continual deferral of roads issues, we acknowledge the need for action and the reduced adverse effects of Alternative 7.

We appreciate the opportunity to review this FEIS. If the Record of Decision is revised, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at 415-972-3846, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

Nova Blazej, Manager
Environmental Review Office
Communities and Ecosystems Division

cc: Kathleen Morse, Forest Supervisor, Lassen National Forest