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

September 9, 2013

Karen L. Hayden, District Ranger
Feather River Ranger District, Plumas National Forest
875 Mitchell Avenue
Oroville, CA 95965

Subject: Draft Environmental Impact Statement for the Sugarloaf Hazardous Fuels Reduction Project, Plumas National Forest, Plumas County, California. (CEQ# 20130213)

Dear Ms. Hayden:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Sugarloaf Hazardous Fuels Reduction Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA recognizes the critical role of fuels management in the health of our nation's forest. We commend the Forest Service for its focus on ecological restoration. Based on our review of the DEIS, we have rated the Preferred Alternative as *Lack of Objections* – (LO) (see enclosed "*Summary of Rating Definitions*").

The DEIS discusses, in three locations (pages 3-32, p. 3-47 and 3-211), the expected changes likely to result from climate change. We encourage the Forest Service to include, in the FEIS, a more systematic and comprehensive discussion of the impacts of climate change on the project, and measures to improve the project's adaptability to climate change. For example, we recommend adding a discussion of the increased vulnerability of specific species under a reasonably anticipated climate change scenario, and an explanation of the projected shift of forest species to more suitable range elevations. The FEIS should also discuss measures to improve forest adaptation to climate change, such as the selection of certain species for replanting.

In phone calls with Tom Kelly of my staff, you discussed past and continuing efforts to transport biomass from Plumas National Forest to facilities that generate energy from woody biomass, minimizing criteria pollutant emissions and creating renewable energy. We understand that a local facility previously used for this purpose recently closed, and the Forest Service may not have a viable alternative to prescribed burning. We encourage you to expand the discussion of the limited biomass management options in the FEIS as a matter of disclosure. This may also raise awareness of the need for biomass energy capacity with potential supporters and partners. EPA appreciates the opportunity to comment on the DEIS. When the FEIS is released, please

send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact Tom Kelly, the lead reviewer for this project. Tom can be reached at (415) 972-3856 or kelly.thomasp@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Summary of the EPA Rating System

cc (via email): Gretchen Bennitt, Northern Sierra Air Quality Management District
Prab Sethi, California Energy Commission