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

SEP 17 2012

Earl W. Ford, Forest Supervisor
Plumas National Forest
P.O. Box 11500
159 Lawrence Street
Quincy, CA 95971

Subject: Final Environmental Impact Statement for the On Top Hazardous Fuel Reduction Project, Butte and Plumas Counties, California (CEQ# 20120264).

Dear Mr. Ford:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the On Top Hazardous Fuel Reduction Project (Project). 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 Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Plumas National Forest on April 16, 2012. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding impacts to riparian areas, public health impacts of air emissions, and canopy levels falling below minimum suitable habitat levels for Species of Concern and the practicality of including the Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project (HFQLG) in the Project.

As described in the FEIS, the proposed project continues to be a part of the HFQLG and includes construction of Defensible Fuel Profile Zones and tree harvest using group selection silvicultural methods. EPA previously expressed environmental objections to the Forest Service regarding the HFQLG in our letter, dated 7/26/99, about water quality impacts from road construction, increased habitat fragmentation from group selection, and the potential for noxious weed proliferation. We continue to have these concerns in relation to the cumulative effects of the Project and other HFQLG projects in the Plumas National Forest.

We agree with the general statement provided in the response to our comment on page 404 of the FEIS. It states, "Monitoring is fundamental to well-informed decision making that can influence future conditions." However, this statement refers to project specific not comprehensive monitoring of the HFQLG project area. The document continues to explain that the need for the project is in part to implement the HFQLG but doesn't acknowledge that the HFQLG project ends September 30, 2012. This will result in the Project being implemented after the HQFLG has been discontinued and monitoring of its environmental impacts to the Plumas National Forest as a whole will no longer be in place as originally intended for the HQFLG. EPA recommends that the Record of Decision (ROD) commit to continued comprehensive monitoring of the entire HFQLG project area in order to ensure complete data collection, informed long-term resource management decisions, and analysis of cumulative impacts from the Project. This information, if used to inform future decision-making, will aide in maintaining the sustainability of the forest environment.

We appreciate the opportunity to review this FEIS. 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.

Please note that starting October 1, 2012, EPA Headquarters will not accept paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012, must be made through the EPA's new electronic EIS submittal tool: e-NEPA. To begin using e-NEPA, you must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

Sincerely,

For Kathleen Martyn Goforth, Manager
Environmental Review Office

cc:

Carol Spinos, Senior NEPA Planner
Plumas National Forest

Randy Moore, Reviewing Official
USDA Forest Service, Regional Office R5

Karen L. Hayden, Feather River District Ranger