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

August 15, 2012

Patricia A. Grantham, Forest Supervisor
Klamath National Forest
1711 S. Main Street
Yreka, CA 96097-9549
Attn: Johnny O'Neil Project

Subject: Final Environmental Impact Statement for the Johnny O'Neil Late-Successional Reserve Habitat Restoration and Fuel Reduction Project, Siskiyou County, California. (CEQ# 20120252)

Dear Ms. Grantham:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Johnny O'Neil Late-Successional Reserve Habitat Restoration and Fuel Reduction 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 Klamath National Forest on October 28, 2011. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding impacts to public health from air emissions, the decommissioning of roads and climate change.

We continue to have concerns regarding the cumulative impacts from climate change to the project area in the light of rising temperatures. We encourage the Forest Service to include in the ROD a species specific study assessing increased vulnerability of species in the project area from climate change and evaluate present species propensity for shifting to more suitable range elevations (e.g. suitable habitat,) as temperatures change. The findings of such a study should be considered when planning timber harvest and restoration activities. For more information on climate change and risk to plants and wildlife go to: http://www.energy.ca.gov/2008publications/CEC-500-2008-077/CEC-500-2008-077.PDF.

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.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office