



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

April 2, 2007

James M. Peña  
Plumas National Forest Supervisor  
P.O. Box 11500  
Quincy, CA 95971

**Subject:** Draft Supplemental Environmental Impact Statement (DSEIS) for the Empire Vegetation Management Project (CEQ# 070070)

Dear Mr. Peña:

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 Section 309 of the Clean Air Act.

The proposed project is designed to fulfill the management direction and provide feedback related to the National Forest Management Plan, as amended by the Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project (Quincy Pilot Project) and the Sierra Nevada Forest Plan Amendment Supplemental Final EIS and Record of Decision (SNFPA ROD). EPA rated the Draft EIS (DEIS) as EC-2, Environmental Concerns - Insufficient Information, on July 7, 2005 and recommended selection of Alternative E. We reviewed the FEIS, and in our September 15, 2005 letter, concurred that many of our previous concerns had been addressed with the selection of Alternative D as the proposed action.

Based on our review, we have rated this DSEIS as LO-Lack of Objections (see enclosed "Summary of Rating Definitions"). Although we rate this document as LO, we continue to recommend that the Forest Service implement project improvements raised in our previous comment letters relating to air emissions and monitoring.

First, EPA recommends that construction activities be timed to avoid construction on high-wind days and that commitments to use low-sulfur fuels be implemented. In addition, emissions from new road construction, reconstruction, decommissioning, and closure should be assessed and appropriate mitigation applied. EPA strongly recommends a commitment to these mitigation measures in the Final SEIS and the ROD.

Second, in order to provide feedback on the viability of Forest Service actions relative to the SNFPA ROD and the Quincy Pilot Project, extensive monitoring will be required and may require a commitment of significant funds. While monitoring of fuel conditions and water quality is proposed as part of the project, the identification of sufficient funding sources for this monitoring is not disclosed. Timely collection of the monitoring data, as well as adaptive management, must be used in response to Defensible Fuel Profile Zones Maintenance Monitoring results. Because of the importance of monitoring and adaptive management to the long-term success of the Quincy Pilot Project, EPA recommends that the Forest Service commit to funding and implementing these activities in both the Final SEIS and the ROD.

EPA is available to assist the Forest Service in further refinement of proposed mitigation measures for air quality. If you have any questions, please contact me at 415-972-3846 or Summer Allen, the lead reviewer for this project, at 415-972-3847 or [allen.summer@epa.gov](mailto:allen.summer@epa.gov).

Sincerely,

/s/

Nova Blazej, Manager  
Environmental Review Office

Main ID# 4407