



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

March 2, 2006

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# 060047)

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.

On October 10 and 11, 2005, Plumas Forest Project, Sierra Nevada Forest Protection, the Sierra Nevada Forest Protection Campaign, and the Sierra Club Environmental Law Program filed appeals on the Record of Decision for this project. After evaluating the appeals, the Regional Forester found that the Final EIS (FEIS) did not adequately evaluate cumulative effects or the project's effects on forest fragmentation. This DSEIS was prepared to address those discrepancies and includes clarifying information on the temporal and spatial boundaries of the cumulative effects analyses. 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. In particular, we noted that this alternative excluded group selection and individual tree selection activities from planning areas 3G, 7G, and 8G. These watersheds are at, or exceed, the Threshold of Concern (the level of watershed disturbance which, if exceeded, could create adverse watershed or water quality effects despite mitigation efforts). Alternative D also limited mechanical harvesting in Riparian Habitat Conservation Areas.

While we are rating the DSEIS as LO-Lack of Objections (see enclosed “Summary of Rating Definitions”), we continue to emphasize the importance of implementing mitigation measures listed in Appendix F, such as maintaining well-tuned construction equipment and timing construction activities to avoid impacts. We suggest that construction activities be timed to avoid construction on high-wind days and that commitments to use low-sulfur fuels be implemented. In addition, as discussed in our comments on the DEIS, 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 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.

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 415-972-3988 or Summer Allen, the lead reviewer for this project, at 415-972-3847 or allen.summer@epa.gov.

Sincerely,

/s/

Duane James, Manager
Environmental Review Office

Main ID# 4407