



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

February 24, 2006

Jan Ford  
Klamath National Forest  
1312 Fairlane Road  
Yreka, CA 96097-9549

Subject: Draft Environmental Impact Statement (DEIS) for Horse Heli Project  
(CEQ# 20050538)

Dear Ms. Ford:

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. Our comments are provided in accordance with the EPA-specific extension to the comment deadline date from February 13, 2006 to February 24, 2006 (telephone conversation with between Laura Fujii and Jan Ford, February 17, 2006).

Based on our review, we have rated the proposed fuels treatment and timber harvest as Environmental Concerns – Insufficient Information (EC-2). A *Summary of EPA Rating Definitions* is enclosed. While EPA supports the effort to address unhealthy timber stands and reduce high fuel loads, we have concerns with potential adverse effects to cumulative watershed effects, recreation, and non-target species and aquatic resources from gopher control measures. Our Detailed Comments are enclosed.

We recommend implementation of an alternative which minimizes adverse impacts on cumulative watershed effects and recreation, provides the greatest reduction in wildfire risk, and maximizes the reduction in road density. Reducing wildfire risk and road densities would significantly reduce current and future cumulative watershed effects. Of the alternatives evaluated in detail, Alternative 4 best meets these goals.

We commend the proposal to decommission 3.67 miles of road and improve drainage on four other road segments reducing adverse road impacts in an area with one of the highest road densities on the Klamath National Forest.

EPA appreciates the opportunity to review this DEIS. We are available to discuss our Detailed Comments. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have questions, please contact me at 415-972-3988, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,

/s/

Duane James, Manager  
Environmental Review Office  
Communities and Ecosystems Division

Enclosures:  
Summary of EPA Rating Definitions  
Detailed Comments

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR HORSE HELI, SISKIYOU COUNTY, CA, FEBRUARY 24, 2006**

***Implement an alternative that will minimize adverse impacts on cumulative watershed effects.*** The Horse Creek area is identified in the Klamath National Forest Land and Resource Management Plan as an area with watershed concerns (p. 3-28) and has one of the highest road densities on the Klamath National Forest (p. 3-60). While EPA supports the effort to address unhealthy timber stands and reduce high fuel loads, we have concerns with potential effects of the timber harvest and fuels treatment on cumulative watershed effects.

*Recommendation:*

We recommend implementation of an alternative which minimizes adverse impacts on cumulative watershed effects by providing the greatest reduction in wildfire risk and maximum reduction in road density. Of the alternatives evaluated in detail, we note that Alternative 4 appears to meet these goals. It also generates the highest receipts for fuel and road work while providing almost the same level of revenues and jobs as Alternative 2, the proposed action (p. 3-56).

***Provide a monitoring plan to validate cumulative watershed effects modeling.*** The Draft EIS (DEIS) states that all four 7<sup>th</sup> field watersheds are currently at risk for changes in stream flows due to past actions. Current disturbance levels are high and fine sediment is likely to be affecting aquatic habitat (p. 3-65). Cumulative watershed effects modeling indicates slight increases in cumulative watershed effects risk, surface erosion, and landslides (p. 3-34). However, the DEIS concludes that the sediment generated would not be measurable at any one site and would be intercepted by riparian reserves (p. 3-65). A post-project monitoring plan to validate modeling assumptions, results, and conclusions is not included in the DEIS.

*Recommendation:*

The Final EIS (FEIS) should include a monitoring plan to validate cumulative watershed effects modeling results, assumptions, and conclusions. For instance, provide a description of required pre- and post-treatment and project-specific monitoring measures.

***Minimize adverse effects on non-target species and aquatic resources from gopher control measures.*** The action alternatives include gopher control measures where there is an observed threat to planted trees and stand reestablishment. Strychnine-treated grain applied below ground with a probe would be the primary control technique for up to 3 years until the planted trees are established. Post-treatment monitoring for spilled grain and above ground carcasses will occur on 10-15% of total acres baited each year (p. 2-9). EPA is concerned that monitoring 10-15% of acres baited each year may not be sufficient to ensure avoidance of impacts to non-target species or sensitive aquatic resources.

*Recommendation:*

The FEIS should provide information demonstrating that the proposed monitoring is sufficient to protect non-target species and sensitive aquatic resources. Potential information to include could be gopher control research results and citations, a more detailed summary of the Scott River Gopher Control Environmental Assessment and Biological Assessment, and concurrence correspondence from the US Fish and Wildlife Service, California Department of Fish and Game, and Regional Water Quality Control Board.

***Implement an alternative that will minimize adverse impacts on recreation.*** The Pacific Crest National Scenic Trail (Pacific Crest Trail) borders the northern edge of the project area. The project area is also a popular hunting locale. The proposed project includes logging activities adjacent to the Pacific Crest Trail and decommissions roads used by hunters to access specific hunting sites (p. 3-58).

*Recommendation:*

We recommend implementation of an alternative that minimizes adverse impacts to recreation. Impacts to consider are noise, disruption in use, and loss of area access. The FEIS should describe and adopt mitigation measures to reduce such effects. For example, Alternative 4 reduces impacts on Pacific Crest Trail use by avoiding logging activities adjacent to the trail.