



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
January 8, 2008

Diana Craig
Sierra Nevada Forests MIS Amendment
US Forest Service
Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

Subject: Final Environmental Impact Statement for Sierra Nevada Forests
Management Indicator Species (CEQ# 20070543)

Dear Ms. Craig,

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the above 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 our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Sierra Nevada Forests Management Indicator Species (MIS) Amendment Draft Environmental Impact Statement (DEIS) and rated the proposed action as Environmental Concerns – Insufficient Information (EC-2) due to concerns with the ability of the proposed MIS monitoring system to address Forest-specific unique resources, issues, and concerns; the need to integrate past collaborative decisions, such as the 2001 Sierra Nevada Forest Plan Amendment Record of Decision, into the proposed action; and the potential elimination of MIS monitoring requirements for existing projects.

The Record of Decision (ROD) incorrectly states that EPA did not express environmental concerns or request or recommend changes to the environmental analysis presented in the DEIS (ROD, p. 10). A rating of EC-2, as stated above, indicates that our review of the DEIS identified environmental impacts that should be avoided and that we believed the DEIS did not contain sufficient information for EPA to fully assess environmental impacts. The EC-2 rating is further described in the enclosed *Summary of EPA Rating Definitions*. We request the ROD be revised to accurately describe EPA's comments on the DEIS.

While we have concerns about specific elements of the proposed action, EPA supports the need for range-wide consistency and for a MIS monitoring system that effectively informs Forest Service decisions at the landscape, multiple forest level. The selected Alternative 6, the Modified Proposed Action, will help meet these objectives and

provide information that will better inform management decisions and better serve the fundamental MIS purpose.

We continue to believe the following recommendations previously identified by EPA would improve Alternative 6 and its implementation. We urge their integration into Alternative 6, the administrative and technical implementation guidance (a.k.a. monitoring implementation package), and their adoption into the final Forest Service decision.

1. Include references to specific Land and Resources Management Plan habitat and population objectives in the MIS monitoring guidance and identify clear thresholds that prompt management evaluation and changes.
2. Incorporate a recommendation in the monitoring implementation package that resources saved through implementation of the new MIS list and monitoring system be redirected to monitoring and management of at-risk species and sensitive habitats.
3. Include in the monitoring implementation package a description of the process for selecting reference conditions or clearly reference the appropriate scientific literature.
4. Describe in the monitoring implementation package how the effects of historical disturbances should be accounted for.
5. Incorporate as part of the macro-invertebrate monitoring periodic field assessment and recalibration of the proposed River Invertebrate Prediction and Classification System monitoring and assessment model.
6. Consider at-risk watersheds and those with unique and sensitive habitats as a management priority for more frequent field-verification.

We appreciate the opportunity to review this FEIS. Please send one copy of the ROD, if it is revised as requested above or otherwise modified, to the above address (mail code: CED-2). If you have any questions, please call me at 415-972-3846 or Laura Fujii, of my staff, at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/s/

Nova Blazej, Manager
Environmental Review Office

Enclosure:
Summary of EPA Rating Definitions

cc: Vicki Campbell, U.S. Fish and Wildlife Service
Howard Brown, National Marine Fisheries Service
Peter Ode, California Department of Fish & Game
Peter A. Stine, Pacific Southwest Research Station

