



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

October 28, 2011

Patricia A. Grantham, Forest Supervisor
Klamath National Forest
1312 Fairlane Road
Yreka, CA 96097-9549
Attn: Johnny O'Neil Project

Subject: Draft Environmental Impact Statement for the Johnny O'Neil Late-Successional Reserve
Habitat Restoration and Fuel Reduction Project, Siskiyou County, California (CEQ#
20110306)

Dear Ms. Grantham:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) 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 Section 309 of the Clean Air Act.

The agency preferred alternative (Alternative 3) will manage vegetation on approximately 7,280 acres through thinning and burning in the Klamath National Forest in the Happy Camp and Oak Knoll Ranger District. A mile and a half of temporary road will be constructed and 5,140 acres is proposed for prescribed fire. EPA acknowledges the importance of the project's goals of improving forest health and reducing fuel loading to prevent high-severity fire. We support the use of thinning and prescribed underburning as important measures necessary to reduce the risk of fire, promote biodiversity, and restore natural ecological processes within the Late-Successional Reserve (LSR). Project features such as limiting the amount of new road construction will help minimize adverse effects. Overall, the Draft EIS contains valuable information useful to both the public and decision maker(s); however, we have some concerns that should be addressed in the Final EIS.

We have rated the Draft EIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). We are concerned about the public health impacts of air emissions, and we recommend the Final EIS provide additional information regarding mitigation measures, the decommissioning of roads, and climate change. Our enclosed detailed comments provide additional information regarding the concerns identified above.

We appreciate the opportunity to review this Draft EIS and are available to discuss our comments. When the Final EIS is released for public review, please send one hard copy and one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov, or contact me at (415) 972-3521.

Sincerely,

/s/

Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions
EPA Detailed Comments

cc: Siskiyou County Air Pollution Control District
Ken Harris, District Ranger, Happy Camp Ranger District
Thomas Williams, North Coast Water Quality Control Board

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE JOHNNY O'NEIL LSR HABITAT RESTORATION AND FUEL REDUCTION PROJECT, SISKIYOU COUNTY, CALIFORNIA, OCTOBER 31, 2011

Air Quality

Provide information regarding Siskiyou County Air Pollution Control District's (SCAPCD) Smoke Management Program. The Air Quality and Fire and Fuels Resource Report for the Johnny O'Neil Vegetation project (Air Quality Report) states that all burning activities are coordinated with SCAPCD to mitigate smoke impacts (Air Quality Report p. 15) and adverse effects could be minimized through the project design feature AIR-2 FUELS, which includes implementation of Smoke Management Plans (table 2-1, p. 13).

Recommendation:

The Final EIS should include detailed information for how the project will comply with the SCAPCD regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

Include information regarding cumulative air impacts. The Draft EIS does not mention any specific projects that would contribute to cumulative air impacts (p. 102); however, the referenced Air Quality Report refers to the Thom Seider Fuels Project (approx. 30,000 acres) and the Middle Creek project (approx. 70 acres) as being specifically considered in the cumulative air effects analysis. According to the Schedule of Proposed Actions (SOPA) for the Happy Camp/Oak Knoll Ranger District, other projects in the area are currently underway or undergoing NEPA. These include Crawford Vegetation Management project (approx. 3,000 acres) and Two Bit Vegetation project (approx. 9,000 acres). Like the Johnny O'Neil project, both of these projects are due to complete the NEPA process in spring 2012. Project design features such as Burn Day, Marginal Burn Day, and No Burn Day designations will help minimize adverse effects, and burn days will be coordinated with the SCAPCD (p. 102). Although EPA understands the importance of prescribed burning to reduce catastrophic wildfire risk, the number of days to accomplish prescribed burning would compete with other burning nearby in the Happy Camp Ranger district (Air Quality report p. 17). We recommend that the Final EIS include additional measures to mitigate cumulative air emissions as much as possible.

Recommendation:

The Final EIS should include all the projects that could cumulatively result in decreased air quality in the basin (Siskiyou County). The Final EIS should provide more details for mitigation measures that include dust abatement measures, and this information should be in the EIS, and not only available in the Air Quality Report.

Include a Construction and Operations Emissions Mitigation Plan. The Draft EIS presents estimates for emissions from hauling and yarding (Air Quality Report; table 4; p. 16) and states that dust from hauling will be minimized by requiring abatement with either water or some wetting agent (table 2-1, p. 13). We recommend that the Final EIS also include additional measures to mitigate these emissions.

Recommendation:

EPA recommends that the Forest Service include a Construction and Operations Emissions Mitigation Plan for fugitive dust and diesel particulate matter in the Final EIS and adopt this plan in the Record of Decision (ROD). We recommend that the following measures be included in

order to reduce impacts associated with emission of particulate matter and other toxics, particularly in areas where the public or Forest Service staff may be impacted:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or other dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies. The California Air Resources Board has a number of mobile source anti-idling requirements which could be employed. See their website at: <http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>.
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable federal or state standards.

Administrative controls:

- Identify, in the Final EIS, all commitments to reduce construction and operations emissions, and specify air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public).

Asbestos

Clarify whether asbestos is present within the project area. Disturbance of rocks and soils that contain naturally occurring asbestos (NOA) can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen and represents a potential human health risk for those exposed while using roads or trails where it occurs. Very low levels of asbestos in soil can generate airborne asbestos at hazardous levels. It is important to protect human health by limiting the exposure of workers to this air pollutant.

We are concerned about the potential for exposure to NOA from proposed activities. The Draft EIS states that there is “potential for hazard from naturally occurring asbestos from ground-disturbing activities on 122.5 acres and 350 feet of temporary road on ultramafic rock” (p. 34), and that standard mitigation measures would be applied, including constructing lines during wet soil conditions and surfacing roads with materials not containing asbestos (Air Quality Report p. 15). The Draft EIS also states, however, that no projects are currently planned or being implemented within areas containing ultramafic rock (p. 101). These apparently conflicting statements may be confusing to the public and decision makers.

Recommendation:

EPA recommends that the Final EIS identify the project areas that contain ultramafic rock and include maps illustrating these areas in an Appendix. The Final EIS should discuss exposure mechanisms and assess the potential for exposure to elevated levels from proposed activities. The Final EIS should identify and include commitments for measures that can be implemented to protect human health from NOA.

EPA suggests that the Forest Service review the asbestos occurrence information on the California Geological Survey website at http://www.consrv.ca.gov/cgs/minerals/hazardous_minerals/asbestos/index.htm, and the California Air Resources Board (CARB) regulations and guidance at <http://www.arb.ca.gov/toxics/asbestos/asbestos.htm>. The CARB website addresses California’s Asbestos Airborne Toxic Control Measures for surfacing Applications, which apply to unpaved roads.

Closure and Restoration of Roads and Landings

Provide a closure and restoration plan for the proposed temporary roads and landings. The Draft EIS states that 1.4 miles of new temporary roads would be constructed, 5 miles of existing roads would be reconstructed and 45 acres of existing and new landings would be used to access treatment units (p. 38). Although the Draft EIS states that all temporary roads would be closed and hydrologically stabilized following the completion of fuel reduction actions, there is no detailed information provided on when or how this closure would occur. Specifically, there is little information concerning what roads will be decommissioned and the time frame in which the decommissioning will take place.

Recommendation:

We recommend the Final EIS provide a list and map of the roads and trails proposed for decommissioning, as well as a detailed closure and restoration plan for the proposed temporary roads and landings. This plan should include specific information on the extent to which these roads and landings would be recontoured, replanted with appropriate vegetation, monitored, and closed to off-highway vehicle use. We recommend the Final EIS include a specific post-harvest schedule for closure of the temporary roads and landings and discuss the relationship of the restoration and closure plan to the Klamath Travel Management Plan. Additionally, the Final EIS should explain how decommissioning those particular roads and landings will directly contribute to compliance with TMDL implementation requirements for the Klamath Basin.

Climate Change

Include information regarding climate change and its effects in the Final EIS. The Draft EIS discusses climate change briefly on pages 125-126. However, the Vegetation report for the Johnny O’Neil project contains valuable information useful to the public and decision makers. For example, the report contains a simulated climate change scenario in northern CA, discussion of how changes in tree

thinning affect carbon sequestration, and how climate change will impact thinned strands. The report also compares the no-action and the action alternatives, and explains that, under alternatives 2, 3 and 4, the effects of climate change on treated forest stands will be less than under the no-action alternative, particularly in regards to tree competition for water (Vegetation Report p. 58). We encourage such discussion in NEPA documents because it contributes to improved federal planning and public understanding of the effects of climate change on forest ecosystems and forest management.

Recommendation:

Site-specific information related to Klamath Forest and the effects from climate change should be included in the Final EIS and not only be available in the Vegetation Report. We recommend the Final EIS include a more detailed description of climate change and its implications for successful reforestation. For example, describe and evaluate projected climate change consequences such as frequency of high intensity storms, amplified rain events, the severity and frequency of insect outbreaks (Vegetation Report p. 90), droughts, and fire seasons (Vegetation report p. 90), forest plant distributions (Vegetation report p. 91) and their effects on the success of reforestation efforts.