



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

March 18, 2011

Alice B. Carlton
Forest Supervisor
Plumas National Forest
159 Lawrence Street
Quincy, CA 95971

Subject: Draft Environmental Impact Statement for Keddie Ridge Hazardous Fuels Reduction Project, Plumas National Forest, Plumas County, CA (CEQ# 20110030)

Dear Ms. Carlton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above-referenced 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 acknowledges the importance of the project's goals to improve forest and watershed health, reduce fuel loading, and protect and enhance habitat for sensitive plant and wildlife species. The preferred alternative (Alternative A) proposes to construct 5,175 acres of Defensible Fuel Profile Zones (DFPZs) and to decommission one mile of roads. We recognize the long-term benefits of decreasing wildfire risk, and we support the inclusion of the resource protection measures and best management practices described in the DEIS. We have rated the DEIS as Lack of Objections (LO) (see enclosed "*Summary of Rating Definitions*"). EPA has a few recommendations for further information that should be addressed in the FEIS.

We recommend the FEIS include a more detailed description of climate change and the implications for successful reforestation. The DEIS notes that climate change trends, such as summer drought, may increase the frequency and severity of wildfires (p. 229). We encourage the Forest Service to elaborate on aspects of the project's monitoring related to climate change, including temperature and precipitation, and how they can be incorporated into the goals of successful fuel management and watershed restoration. For example, describe and evaluate projected climate change impacts on the severity and frequency of insect outbreaks, droughts, and fire seasons in the Plumas National Forest and how these anticipated effects will impact the Keddie Ridge project's objectives of forest and watershed health. We encourage such discussion in NEPA documents since it contributes to improved federal decision-making and public understanding of the effects of climate change on forest ecosystems and forest management, particularly the effects of hotter and drier conditions in stressing trees and contributing to the increasing frequency of bark beetle outbreaks.

EPA also recommends that the FEIS describe the strategy for proposed road decommissioning and improvements. One of the purposes of the project is to improve watershed health in the Mt. Hough Ranger District and the DEIS cites roads as the largest single human-caused source of habitat degradation within the project area (p. 4). Little information is present in the DEIS as to how the project will specifically improve watershed health, aside from the commitment to decommission 1 mile of roads upon project completion and to potentially improve 100 miles of roads that are already open (Appendix C). We recommend the FEIS provide a map of the roads and trails proposed for improvement, as well as a detailed closure and restoration plan for the proposed decommissioned roads. This plan should include specific information on the extent to which these roads would be recontoured, replanted with appropriate vegetation, monitored, and closed to off-highway vehicle use. Additionally, the FEIS should explain how decommissioning those particular roads and not others will directly contribute to watershed improvements, and a list of the applicable BMPs should be included, perhaps as an appendix.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: CED-2). Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

cc: Katherine Carpenter, Project Leader

Enclosures: Summary of EPA Rating Definitions