



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

November 15, 2011

Mr. Vern Keller  
Project NEPA Lead  
Humboldt-Toiyabe National Forest  
1200 Franklin Way  
Sparks, Nevada 89431

Subject: Final Environmental Impact Statement for the Ely Westside Rangeland Project, Lincoln, Nye, and White Pine Counties, Nevada (CEQ# 20110349)

Dear Mr. Keller:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Forest Service on August 11, 2011. We rated the DEIS as Lack of Objections - Adequate (LO-1) because we strongly support the adaptive management approach designed for this project. We did question, however, whether the Forest Service would have the necessary monitoring and enforcement resources to implement the plan. We also recommended that the Forest Service discuss in the FEIS how climate change may affect the planning area.

The FEIS addresses the major issues pertaining to monitoring and enforcement identified in our review of the DEIS. The EPA commends the Forest Service for its detailed response explaining the differences between the short-term and long-term monitoring strategies designed for this project, as well the resources that will be necessary to implement these strategies. Additionally, we thank the Forest Service for including in the FEIS supplemental information on the effects of climate change on the planning area. We recommend that the Forest Service expand on this analysis by committing to assessing, and responding to, potential climate-induced changes for this project, and updating the adaptive management plan accordingly.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at (415) 947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

/s/

Kathleen Martyn Goforth, Manager  
Environmental Review Office (CED-2)