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

June 10, 2005

Sam Frink
Weaverville Ranger District
United States Forest Service
PO Box 1190
Weaverville, CA 96093

Subject: Browns Project Draft Environmental Impact Statement (EIS) [CEQ # 50166]

Dear Mr. Frink:

The Environmental Protection Agency (EPA) has reviewed the document referenced above. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1509), and Section 309 of the Clean Air Act.

We have rated this EIS as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). Our rating is based on concerns regarding the: 1) selection of the preferred alternative; 2) impacts to threatened fisheries; and 3) air quality impacts. These concerns should be addressed in the Final EIS and are discussed below.

EPA supports the selection of Alternative 4 as the preferred alternative, as opposed to Alternative 3, the proposed action. Although Alternative 4 would allow for a slightly reduced amount of timber harvest, the implementation of Alternative 4 would have the same effect of the fire regime condition class as Alternative 3 and is consistent with the management objectives in the Land Resource Management Plan (p.g. 4-6). However, when compared to the proposed action, Alternative 4 reduces erosion, water quality impacts, and old-growth and late-successional forest impacts, as the project plans do not include new road construction (p.g. 4-8). Because Alternative 4 meets the same project objectives as the proposed action, but with significantly fewer environmental impacts, EPA recommends that the Final EIS identify Alternative 4 as the preferred alternative.

Adverse indirect effects to Federally-threatened Southern Oregon Northern California Coast (SONCC) Coho Salmon and Winter-Run Steelhead, a Management Indicator species, are likely to occur under Alternatives 3 and 4. These impacts are expected due to short-term increases in turbidity from harvest, fuels treatment, and road decommissioning. In addition, direct effects to Riparian Reserves are expected (p.g 4-10). Because of these direct and indirect

impacts, the EIS should verify that the buffers analyzed and mitigation measures discussed are in accordance with those recommended "reasonable and prudent measures" to avoid and minimize potential impacts to fish and wildlife, suggested by the US Fish and Wildlife Service (FWS), NOAA Fisheries (NOAA), or the California Department of Fish and Game (CDFG).

The Draft EIS does not present a complete air quality impacts analysis. The EIS should delineate the air shed that will be affected by project operations, and provide an impacts analysis for air emissions from project activities. We note that the operations of the proposed tractor and cable yarding, when added to the effects of other timber sales in the Browns Project Boundary (p.g. 4-22), may have cumulative impacts on air quality. The EIS should analyze cumulative impacts to air quality, and include mitigation measures as appropriate, such as maintaining properly tuned equipment and the use of low-sulfur diesel fuels. The EIS should also include an evaluation of hazardous materials in or near the project site.

EPA appreciates the opportunity to review and comment on this EIS. Please send two (2) copies of the EIS to this office at the same time it is officially filed with our Headquarters Office of Federal Activities. If you have questions, please contact Summer Allen, the lead reviewer for this project, at 415-972-3847.

Sincerely,

/S/
Nova Blazej, Acting Manager
Environmental Review Office
Communities and Ecosystems Division

Main ID# 004549

Enclosures:
Summary of Rating Definitions