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

September 15, 2005

James M. Peña
Plumas National Forest Supervisor
P.O. Box 11500
Quincy, CA 95971

Subject: Final Environmental Impact Statement (FEIS) for the Empire Vegetation Management Project (CEQ# 050337)

Dear Mr. Peña:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document 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 proposed project is designed to fulfill the management direction in the National Forest Management Plan, as amended by the Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project (Quincy Pilot Project) and the Sierra Nevada Forest Plan Amendment Supplemental Final EIS and Record of Decision (SNFPA ROD). EPA rated the DEIS as EC-2, Environmental Concerns - Insufficient Information.

We commend the Forest Service for selection of Alternative D over Alternative A, the proposed action in the DEIS. While Alternative D is not the environmentally preferred alternative, this alternative excludes from group selection and individual tree selection activities planning areas 3G, 7G, and 8G, which are watersheds that are at, or exceed, the Threshold of Concern. Alternative D also limits mechanical harvesting in Riparian Habitat Conservation Areas (RHCAs).

The information that has been included on the Northern Sierra Air Quality Management District (NSAQMD) and the calculations of emissions for burned areas in the project area are important for protection of public health, and we commend the Forest Service's inclusion of these analyses in the FEIS. Plumas County is in nonattainment status for particulate matter less than 10 microns in diameter (PM-10) and in nonattainment for particulate matter less than 2.5 microns in diameter (PM-2.5) in Portola Valley. Therefore, the proposed mitigation, including consultation with the NSAQMD, monitoring for dust abatement, and road-building practices that reduce emissions, are increasingly important throughout implementation of the project. The

document states that the estimated increase in prescribed burning over the next five years "may have a tremendous impact on local PM-10 and PM-2.5 levels, unless appropriate mitigations are employed" (p.g. 3-45).

We emphasize the importance of implementing mitigation measures listed in Appendix F, such as maintaining well-tuned construction equipment and timing of construction activities to avoid impacts. We suggest that construction activities be timed to avoid construction on high-wind days and that commitments to use low-sulfur fuels be implemented. In addition, as discussed in our comments on the DEIS, emissions from new road construction, reconstruction, decommissioning, and closure should be assessed and appropriate mitigation applied. EPA strongly recommends a commitment to these mitigation measures.

The purpose of this pilot project is to provide feedback on the viability of Forest Service actions relative to the SNFPA ROD and the Quincy Pilot Project. Extensive monitoring will be required to provide this feedback and may require a commitment of significant funds. While monitoring of fuel conditions and water quality is proposed as part of the project, the identification of sufficient funding sources for this monitoring is not disclosed. Timely collection of the monitoring data as well as adaptive management must be used in response to Defensible Fuel Profile Zones Maintenance Monitoring results. Because of the importance of monitoring and adaptive management to the long-term success of the Quincy Pilot Project, EPA recommends that the Forest Service commit to funding and implementing these activities.

Again, EPA commends the Forest Service for selecting a preferred alternative that is more protective of the environment and for identifying air quality mitigation measures that can reduce the health impacts of the proposed project. EPA is available to assist the Forest Service in further refinement of proposed mitigation measures for air quality. If you have any questions, please contact me or Summer Allen, the lead reviewer for this project, at 415-972-3847 or allen.summer@epa.gov.

Sincerely,

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

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