



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

July 31, 2009

Thomas Hudson
Mad River Ranger District
741 State Highway 36
Bridgeville, CA 95526

Subject: Draft Environmental Impact Statement (DEIS) for the Beaverslide Timber Sale
and Fuel Treatment Project, Trinity County, CA (CEQ# 20090189)

Dear Mr. Hudson:

The 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.

The proposed action (Alternative 5) will harvest approximately 2,471 acres of commercial timber in the Mad River Ranger District, utilizing a thinning prescription, and treat approximately 2,309 acres of hazardous fuels. EPA understands that the project is intended to provide a sustainable timber supply for local communities and reduce fire hazard and risk within the wildland-urban interface (WUI) in the vicinity of Ruth, California.

EPA commends the Forest Service for removing Alternative 2 from the proposed Alternatives in light of new biological information concerning the Northern spotted owl (NSO) habitat. We also commend the Forest Service for its commitment to decommission and repair roads that are the primary sources of sediment to nearby watersheds. We support the best management practices and resource protection measures included in the project design. While many of the project's features illustrated in the DEIS are commendable, we have concerns regarding potential adverse impacts to already impaired watersheds. For this reason, we have rated the DEIS as Environmental Concerns – EC-2 (see enclosed "Summary of Rating Definitions").

We appreciate the opportunity to review this DEIS. Our detailed comments are enclosed. When the FEIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). In the meantime, we are available to discuss our comments. If you have any questions, please contact Jennifer Gagnon, the lead

reviewer for this project, at (415) 947-4121 or Gagnon.Jennifer@epa.gov, or me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures:

Summary of EPA Rating Definitions

Detailed Comments

cc: Tyrone Kelley, Forest Supervisor Six Rivers National Forest
Central Valley Regional Water Quality Control Board
North Coast Unified Air Quality Management District (NCUAQMD)

US EPA DETAILED COMMENTS ON BEAVERSLIDE TIMBER SALE AND FUEL TREATMENT PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT, July 31, 2009

Water Resources

Demonstrate that the project will not exacerbate water quality impairment in the Mad River. In 1992, the Mad River was added to California's impaired waters list, pursuant to Section 303(d) of the Clean Water Act, due to elevated sedimentation/siltation and turbidity as part of listing the entire Mad River basin. In the 2006 303(d) listing, temperature was also identified as an additional impairment to the watershed (p. 128).

Recommendation:

The Final Environmental Impact Statement (FEIS) should include data that demonstrate that the project would not contribute to further water quality impairment in the Mad River and would comply with any applicable Total Maximum Daily Load (TMDL) requirements.

Describe the Upper Mad River Watershed analysis. The Draft Environmental Impact Statement (DEIS) states that a watershed analysis was completed for Upper Mad River in January, 1998 (p. 144).

Recommendations:

The Forest Service should consider including recommendations made in the existing watershed analysis as an appendix. Additionally, the Forest Service should describe whether a more up-to-date watershed analysis would be necessary during the project lifetime.

Conduct cumulative watershed effects field work prior to ground disturbance. In the DEIS, the Forest Service assessed cumulative watershed effects for the Beaverslide Project. The methodology used incorporates an Equivalent Roaded Acres (ERA) model used by the Pacific Southwest Region (p. 146). The DEIS states, where ERA results approach or exceed a given watershed's threshold of concern (TOC), further field work would be required to determine whether cumulative watershed effects are present, and whether land management activities would adversely add to those effects and result in detrimental impacts to beneficial uses (p. 147).

Recommendations:

The Forest Service should conduct further cumulative watershed effects field work prior to ground disturbance, such as construction of temporary roads, to avoid and minimize cumulative watershed effect. Information obtained from the field work should be included in the FEIS. Where the watershed is already close to, at, or over its TOC, the Forest Service should redesign the project to either avoid disturbances in these watersheds or include additional mitigation and/or best management practices to reduce erosion and sedimentation actions.

Wildlife Habitat

The DEIS states that, in 2009, suitable northern spotted owl nesting and roosting habitat protocol surveys would be conducted to establish occupancy and nesting status in 2008 and 2009 (p. 22).

Recommendation:

The Forest Service should include a summary of the survey results and further describe how they will be used to ensure that the project activities avoid or minimize impacts to northern spotted owls.

Air Quality

Provide a detailed smoke management plan describing the North Coast Unified Air Quality Management District (NCUAQMD) Smoke Management Program. EPA acknowledges the need to reduce fuel, which may lead to a reduction of emissions from wildfires. We understand that the project area is in "attainment" under the Federal Clean Air Act, however, California State standards for PM₁₀ (particulate matter smaller than 10 microns) have not been met (p. 149). Smoke from wildfires and prescribed burns can be a major contributor of PM₁₀ levels and is of particular relevance to human health (p. 150). The DEIS states that during the planning and implementation of its resource management activities that affect air quality, the Forest Service would coordinate with the appropriate air quality regulatory agencies (p. 154).

Recommendation:

The FEIS should include a detailed smoke management plan describing the NCUAQMD regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

Describe air quality effects and potential emissions from equipment and harvest activities. A description of existing condition is provided in the DEIS (p. 149). A description of potential pollutants from prescribed burns is also included in the DEIS (p. 150). Table 57 illustrates estimated daily emissions (from an annual average) for Trinity County (p. 151-153). However, a description of the potential effects generated from equipment emissions and dust generated by fuel treatment activities is not considered.

Recommendation:

We recommend that the Forest Service include in the FEIS a description of the potential effects of equipment emissions and dust generated by fuel treatment activities.

Closure and Restoration of Roads and Landings

Provide a closure and restoration plan for the proposed temporary roads and landings. The DEIS states that, under all action alternatives, 7.4 miles of system road are to be decommissioned with this project. In addition, 0.87 mile of non-system road not used by this project would be decommissioned, as well as 2.94 miles of nonsystem road used as temporary roads. An additional 0.83 mile of existing non-system road located within harvest units but not used for log haul would be decommissioned if Alternative 4 were

chosen (p. 161). Depending on the chosen alternative, up to 97 existing tractor, skyline, and helicopter landings would be used and up to 4 new helicopter landings may be built where required to assist in logging operations (p. 13).

Recommendations:

We recommend the FEIS provide a detailed closure and restoration plan for the proposed temporary roads and landings. This plan should include specific information on whether these roads and landings would be recontoured, replanted with appropriate vegetation, monitored, and closed to off-highway vehicle use. We recommend the FEIS include a specific post-harvest schedule for closure of the temporary roads and landings.

Wildland-Urban Intermix

Provide a summary of the related Community Wildfire Protection Plan and how it relates to the proposed project. A main component of the purpose and need for this project is to provide fire protection for the wildland-urban interface (WUI) (p. 2). The Healthy Forest Restoration Act (HFRA) encourages the development of Community Wildfire Protection Plans (CWPPs) under which communities designate their WUIs and the locations where fuel reduction projects may take place.

Recommendations:

The FEIS should include a summary of the CWPP and describe actions that will be taken by the Forest Service and the communities to ensure fire protection efforts are consistent, complementary, and fully integrated with the preferred alternative. For example, describe whether local housing and fire safety ordinances are consistent with the effort to reduce and minimize excessive fuels.

Climate Change

Describe climate change and its effects on forest management practices, habitat, and biodiversity. It is believed significant changes in weather patterns could have important implications for how we manage our forests. Current research indicates that climate change could impact California's forests through changes in water supply, timing of snowmelt runoff, and distribution of wildlife, vegetation, and harmful timber insects and diseases; by increasing the length and severity of the fire season; and by altering the growth rates of forest trees and vegetation. The California Climate Action Team recently released a report¹ on the impacts of climate change to California, the latest research, and State efforts to adapt to impacts. The report estimates that the long-term risks of large wildfires in California are substantial, with increases in occurrences statewide ranging from 58% to 128% in 2085.

Recommendation:

We recommend the FEIS include a detailed description of climate change and its implications for effective management of forest resources and the ability to meet requirements of the Forest Land and Resources Management Plan. For example,

¹ Draft 2009 Climate Action Team Biennial Report to the Governor and Legislature. See internet address: <http://www.climatechange.ca.gov/publications/cat/index.html>.

describe and evaluate projected climate change consequences, such as frequency of high intensity storms, amplified rain events, and the severity and frequency of insect outbreaks, droughts, and fire seasons, and their effects on the success of reforestation efforts and adaptive forest management.