



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
March 21, 2011

Scott Armentrout
Forest Supervisor
Sierra National Forest
1600 Tollhouse Road
Clovis, CA 93611

Subject: Draft Environmental Impact Statement for the Fish Camp Project, Sierra National Forest, Madera/Mariposa Counties, CA (CEQ# 20110043).

Dear Mr. Armentrout:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Fish Camp Project (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 health and reduce the intensity and spread of wildfires across the landscape and near communities. We recognize the ecological significance of the Sierra National Forest and support the inclusion of the resource protection measures.

We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). EPA recommends the FEIS include a supplementary analysis on air emissions. Our enclosed detailed comments provide additional information regarding the concerns identified above.

We appreciate the opportunity to review this DEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and two CDs to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or munson.james@epa.gov.

Sincerely,

/s/

Carter Jessop *for*
Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions
Detailed Comments

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE FISH CAMP PROJECT, SIERRA NATIONAL FOREST, MADERA/MARIPOSA COUNTIES, CA March 21, 2011

Air Quality

Page 170 of the DEIS discusses the Clean Air Act (CAA) attainment status for the San Joaquin Valley and Mountain Counties air basins. Some updating/corrections are needed in this section. The document states that the “San Joaquin Valley is classified by both the federal and state standards as *severe non-attainment*” this conflicts with Table 37 which correctly identifies the San Joaquin Valley as Non-attainment Extreme for 1-hour Ozone.

Recommendation:

The Forest Service should include current National Ambient Air Quality Standards (NAAQS), attainment designations and general conformity de minimus levels data in the FEIS.¹ This information changes regularly and the DEIS is incorrect for some of these items.

The project requires further general conformity analysis. The general conformity rule has been revised. The new rule was published in the Federal Register on April 5, 2010 (Volume 75, Number 64) and went into effect on July 6, 2010.²

Recommendations:

Given that the project is in areas of non-attainment and that the emissions exceed de minimus levels, The Forest Service should demonstrate in the FEIS how the project will ensure that applicable emissions will conform to the approved State Implementation Plans and not cause or contribute to violations of the NAAQS, in accordance with the final general conformity rule.

¹ <http://epa.gov/air/criteria.html#1>
<http://www.epa.gov/region9/air/maps/index.html>
<http://www.epa.gov/oar/oagps/greenbk/>
<http://www.epa.gov/air/genconform/deminimis.html>

² <http://frwebgate1.access.gpo.gov/cgi-bin/TEXTgate.cgi?WAISdocID=bb7iTk/20/1/0&WAIAction=retrieve>