



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

July 12, 2010

Patricia A. Grantham, Forest Supervisor
Klamath National Forest
1312 Fairlane Road
Yreka, CA. 96097-9549
Attn: Hi-Grouse Project

Subject: Draft Environmental Impact Statement for the Hi-Grouse Project, Siskiyou County, California (CEQ# 20100194)

Dear Ms. Grantham:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above 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 Section 309 of the Clean Air Act.

The modified proposed action (Alternative 4) will manage vegetation through thinning and burning on approximately 3,847 acres across a 7,450 acre project area in the Klamath National Forest within the Goosenest Ranger District. 1,537 acres is proposed for prescribed underburning and about 3,498 acres will be utilized for commercial thinning. EPA understands that the project is intended to provide a sustainable timber supply for local communities and sustain diverse, fire-resilient ecosystems and a functioning forest and watershed.

EPA acknowledges the importance of the project's goals of improving forest health, reduce fuel loading, and decreasing fuels along important access roads to allow better access for fire suppression activities during fire events. We support the use of thinning and prescribed underburning as important measures necessary to reduce the risk of fire, promote biodiversity, and restore natural ecological processes within the forest. Project features such as limiting the amount of new road construction and road maintenance actions will help minimize adverse effects. We support the best management practices (BMPs) and resource protection measures included in the project design and have rated the DEIS as Lack of Objections—LO (see enclosed "Summary of Rating Definitions").

EPA recommends full disclosure of information regarding air quality emissions. The document states that the project is exempt from a general conformity determination because Siskiyou County is in attainment for PM_{2.5} and PM₁₀ (pg. 115). However, Siskiyou County is in non-attainment status for ozone (pg. 115) and the Hi-Grouse project will release pollutants including the ozone precursors volatile organic compounds (VOC) and nitrous oxides (NO_x) (pg. 114). In accordance with the Clean Air Act (CAA) General

Conformity requirements, in federal non-attainment and maintenance areas, a determination must be made that emissions will not exceed the applicable *de minimis* threshold levels, measured in tons per year, for criteria pollutants of concern. If emissions would exceed an applicable *de minimis* threshold, a conformity determination is required to document how the federal action will affect the State Implementation Plan (SIP). The final environmental impact statement (FEIS) should quantify the emissions from the Hi-Grouse project, determine if they will exceed *de minimis* thresholds for ozone precursors VOC and NO_x, and whether a general conformity determination is needed that will demonstrate compliance with the SIP.

The DEIS states that a smoke management plan will be submitted to Siskiyou County Air Pollution Control District (SCAPCD) prior to any prescribed burning. The FEIS should include details regarding the smoke management plan that sets forth how the project will comply with the SCAPCD regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

Additionally, EPA recommends clarification regarding possible use of herbicides or pesticides. The list of applicable BMPs for the Hi-Grouse Project is included in Appendix D. BMPs 5.8-5.11 list potential best practices for use of pesticides and/or herbicides but the DEIS does not indicate that pesticides may be used. If pesticide use is included in the scope of the project, this information and all environmental impacts associated should be disclosed in the FEIS.

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 one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov, or contact me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions

cc: Siskiyou County Air Pollution Control District
Wendy Dobrowolski, Goosenest Ranger District