



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

June 9, 2010

Tyrone Kelley
Forest Supervisor
Six Rivers National Forest
1330 Bayshore Way
Eureka, CA 95501-3834

Subject: Draft Environmental Impact Statement for the Kelsey Peak Timber Sale and
Fuelbreak Project, Trinity County, California (CEQ# 20100139)

Dear Mr. Kelley:

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 proposed action (Alternative 2A) will manage vegetation on approximately 3,582 acres through commercial timber harvest and fuelbreaks in the Mad River Ranger District. Commercial timber harvest would occur on approximately 1,808 acres and fuelbreaks along roads for fire suppression would be created on 2,542 acres. 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 modifying Alternative 2 among 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. Additionally, elimination of all treatments within the inner riparian reserves will be beneficial to maintaining water quality and compliance with established Total Maximum Daily Load (TMDL) requirements. We support the best management practices 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 recognizes the ecological significance of the Six Rivers National Forest and support the inclusion of the resource protection measures and best management practices described in the DEIS. Project features such as limiting the amount of new road construction will help minimize adverse effects. We are concerned, however, about an apparent inconsistency between the Kelsey Peak project and the Record of Decision (ROD) for the Lower Trinity and Mad River

Travel Management Plan published on April 30, 2010. The Kelsey Peak DEIS states that “all new and existing roads for this project will be decommissioned upon project completion” and Table 1 includes a list of those roads that will be removed (pg. 22). Many of the roads in Table 1 are included as part of the updated National Forest Transportation System (NFTS) as published in the ROD for the Travel Management Plan. We understand that the Kelsey Peak Project DEIS was published prior to the Travel Management Plan ROD. Any changes made to the NFTS through decommissioning of roads should be clarified in the Kelsey Peak Final Environmental Impact Statement (FEIS) and ROD.

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: North Coast Unified Air Quality Management District