



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

October 23, 2008

Patricia Grantham
Forest Supervisor
ATTN: Leslie Burkhardt
Gooseneck Ranger District
Klamath National Forest
37805 Highway 97
Macdoel, CA 96058

Subject: Draft Environmental Impact Statement (DEIS) for Round Valley Fuels
Reduction and Vegetation Management Project, Siskiyou County, CA.
(CEQ# 20080349)

Dear Ms. Grantham:

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 our NEPA review authority under Section 309 of the Clean Air Act.

Based on our review, we have rated the proposed fuels reduction and vegetation management project as Lack of Objections (LO). A *Summary of EPA Rating Definitions* is enclosed. EPA supports the effort to address unhealthy timber stands, reduce high fuel loads within the Wildland Urban Interface, and reduce road densities. Our review has not identified any potential environmental impacts requiring substantive changes to the proposal. Cumulative Watershed Effects would be well below risk thresholds and all Aquatic Conservation Strategy objectives will be met through implementation of Best Management Practices, resource protection measures, and site-specific design features.

We commend the proposal to close 18.1 miles of unauthorized roads, redesignate 4.3 miles of open authorized roads for closure to public access (maintenance level 1), and seasonal closure of 3.2 miles of roads open but not maintained for passenger cars (maintenance level 2). These actions will reduce the current road density from 3.24 miles per square mile to 2.67 miles per square mile post-project; reducing adverse effects on wildlife and reducing sediment and turbidity sources. Also of note is the proposal to rehabilitate an unhardened water drafting site and close unauthorized roads in the aspen stand (Stand 742-52) on Antelope Creek; thereby eliminating these sources of sediment and turbidity in this perennial stream.

A number of studies specific to California have indicated the potential for significant environmental impacts as a result of changing temperatures and precipitation.¹ In accordance with Government Accountability Office direction,² we recommend the final environmental impact statement (FEIS) include a description and short discussion of reasonably foreseeable climate change effects on proposed project actions.³ We believe consideration of climate change effects and the feasibility of achieving future desired conditions is relevant given that stand development was modeled for a 50-year period.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy to the address above (mail code: CED-2). If you have any questions, please contact Laura Fujii, the lead reviewer for this project, at (415) 972-3852 or fujii.laura@epa.gov, or me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures:
Summary of EPA Rating Definitions

¹ Examples: 1) Our Changing Climate: Assessing the Risks to California, A Summary Report from the California Climate Change Center, July 2006; 2) Climate Change and California Water Resources, Brandt, Alf W.; Committee on Water, Parks & Wildlife, California State Assembly, March 2007; 3) Climate Change and California, California Energy Commission, November 2003, 100-03-017F; 4) <http://www.fs.fed.us/pnw/pep/climatechange/>

² “Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources” (GAO, August 2007). According to the GAO report, federal land and water resources are vulnerable to a wide range of effects from climate change.

³ There are a number of resources for NEPA evaluation of climate change. Example: “Addressing Global Warming (Climate Change) in CEQA and NEPA Documents in Post AB 32 Regulatory Environment, Jones & Stokes for Climate Change Focus Group, January 1, 2007.