



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

September 8, 2006

Bernie Weingardt  
Regional Forester  
Region 5, Pacific Southwest Region  
1323 Club Drive  
Vallejo, CA 94592

Subject: Draft Environmental Impact Statement SPI Road Project, Trinity County, CA  
(CEQ# 20060312)

Dear Mr. Weingardt:

The U.S. Environmental Protection Agency (EPA) has reviewed the above project 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.

Based upon our review, we have rated this Draft Environmental Impact Statement (DEIS) as EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We are concerned with potential impacts to air quality, water quality, hydrology, fish and wildlife; and the lack of detailed information and evaluation of the connected Sierra Pacific Industries Timber Harvest Plan. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. Please send one copy of the Final EIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions, please contact Laura Fujii, the lead reviewer for this project, at (415) 972-3852 or at [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Duane James".

Duane James, Manager  
Environmental Review Office

Enclosures: Summary of EPA Rating System  
Detailed Comments

cc: Tyrone Kelley, Forest Supervisor, Six Rivers National Forest  
Katherine Worn, Lower Trinity Ranger District

**DETAILED COMMENTS**

***Evaluate the direct, indirect, and cumulative impacts of the connected Sierra Pacific Industries Timber Harvest Plan.*** The draft environmental impact statement (DEIS) does not evaluate the direct, indirect, or cumulative impacts of the connected Sierra Pacific Industries Timber Harvest Plan (SPI THP). The SPI THP cannot proceed unless the special use permit for the SPI Road Project is approved. Therefore, the SPI THP is a connected action which should be included in the scope of the DEIS pursuant to the National Environmental Policy Act (NEPA) (40 CFR Part 1508.25 Scope). The SPI THP would harvest timber on 138 acres within the Underwood Creek watershed, a key watershed that is relatively undeveloped and pristine within a designated roadless area (pps. 56, 58, 77). The timber harvest plan includes 45 acres of clearcutting, 93 acres of thinning or selective harvesting, 1.5 miles of new road construction, pile burning, and possible use of herbicides on 45 acres (p. 39). These timber management activities could have significant adverse environmental effects.

**Recommendations:**

The FEIS should include a rigorous assessment of the potential impacts of the SPI THP in combination with the proposed SPI access road across Forest Service lands. Of specific interest are the potential direct, indirect, and cumulative effects to air quality, water quality, hydrology, aquatic resources, fire and fuels, fish and wildlife, and roadless characteristics of the Underwood Creek watershed.

The FEIS should include a detailed description of the SPI THP, the purpose and need for the SPI THP, and include it as an appendix.

***Describe the economic and technical practicability of implementing Alternative 4 Helicopter Access.*** EPA is concerned with the potential impacts of the connected SPI THP that would log 138 acres of mid-mature and late-mature stands within the undeveloped and pristine Underwood Creek watershed. Our concern is heightened by the importance of this watershed as a cold-water refuge for sensitive anadromous fish, and the lack of evaluation in this DEIS of the direct, indirect, and cumulative impacts of the SPI THP enabled by the SPI Road Project. Given our concern, we recommend serious consideration of Alternative 4 Helicopter Access, if it is technically and economically practicable. This alternative appears to minimize the long-term effects of the access and harvest activity in the Underwood Creek watershed.

**Recommendation:**

The FEIS should describe the technical and economic practicability of implementing Alternative 4 Helicopter Access. For instance, provide specific information on the projected cost of helicopter access, its technical feasibility, and whether these costs are within the acceptable range of similar timber harvest plans. If Alternative 4 is practicable, we recommend selection of this alternative.

***Describe the potential impact on the proposed Northern California Coastal Wild Heritage Wilderness Act.*** The DEIS states that most of the Underwood Inventoried Roadless area is included in wilderness bills before the U.S. Senate (S. 128) and U.S. House of Representatives (H.R. 233) as the "Northern California Coastal Wild Heritage Wilderness Act." The entire project area is contained within the U.S. Senate bill (p. 77). The DEIS does not describe whether implementation of the SPI Road Project and connected SPI THP would affect the outcome for this bill.

**Recommendation:**

The FEIS should discuss the potential effects of the proposed action and SPI THP implementation on the Northern California Coastal Wild Heritage Wilderness Act.