



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**75 Hawthorne Street
San Francisco, CA 94105**

November 9, 2007

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

**Subject: Final Environmental Impact Statement Sierra Pacific Industries (SPI) Road
Project, Trinity County, CA (CEQ# 20070427)**

Dear Mr. Weingardt:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the SPI Road Project, Trinity County, CA Draft Environmental Impact Statement (DEIS) and provided comments to the U.S. Forest Service on September 8, 2006. We rated the DEIS as Environmental Concerns-Insufficient Information (EC-2). Our concerns were based on the need to include detailed information on the Sierra Pacific Industries Timber Harvest Plan (SPI THP) in the Final Environmental Impact Statement (FEIS), as well as an analysis of the cumulative impacts of the proposed road project in conjunction with the SPI THP. These issues were not clearly addressed in the FEIS. We recommend that the Record of Decision (ROD) for this project include updated information on these two issue areas. Please see our Detailed Comments (attached).

We appreciate the opportunity to review this FEIS and request a copy of the Record of Decision when it becomes available. If you have any questions, please call me at (415) 972-3846 or Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,

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Nova Blazej
Environmental Review Office

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cc: Tyrone Kelley, Forest Supervisor
Enclosure: EPA's Detailed Comments

EPA DETAILED COMMENTS, SPI ROAD PROJECT, LOWER TRINITY RANGER DISTRICT, SIX RIVERS NATIONAL FOREST, TRINITY COUNTY, CA FEIS, NOVEMBER 2007

Cumulative Impacts of the Connected Sierra Pacific Industries Timber Harvest Plan

Of specific concern to EPA 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 of the proposed project.

In our comments on the Draft Environmental Impact Statement (DEIS), we stated that the Final Environmental Impact Statement (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. We further stated that 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. However, the FEIS does not follow this recommendation. Consequently, the potential cumulative impacts of the proposed project, in combination with SPI THP, are not clearly disclosed. We also note that the SPI THP expired on May 28, 2007 (pg. viii), and the FEIS does not discuss the relative significance of this fact.

Recommendation: The Record of Decision (ROD) should include full disclosure of the potential cumulative effects of the SPI THP in combination with the proposed project. The ROD should also discuss the significance of expiration of the SPI THP.

Technical & Economic Practicability of Helicopter Access

In our comments on the DEIS, we stated that the FEIS should 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. The DEIS noted that the general rule-of-thumb is that helicopter logging is three times more expensive than tractor logging. The FEIS did not include an analytical cost analysis of helicopter access.

Recommendation: The ROD should include a detailed explanation of the analytical cost basis on which the Forest Service reached its decision with regarding to providing SPI access to the SPI land.

Impact on the Northern California Coastal Wild Heritage Wilderness Act

We reiterate our concern that there should be discussion of the potential effects of the proposed action and SPI THP implementation on the Northern California Coastal Wild Heritage Wilderness Act. The FEIS stated that there is no Wilderness that would be affected. However, 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 FEIS does not describe whether implementation of the SPI Road Project and connected SPI THP would affect the outcome for this bill.

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