UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 26, 2007

Reply To: ETPA-088 Ref: 05-056-AFS

Sue Stresser, Project Manager
Department of Agriculture - U. S. Forest Service
Klamath National Forest
1312 Fairlane Road
Yreka, CA 96097

Dear Ms. Stresser:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Mt. Ashland Late-Successional Reserve Habitat Restoration and Fuels Reduction Project** (CEQ No. 20070238) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

Approximately 30% of the Mt. Ashland Late-Successional Reserve (LSR) is currently in a late-successional forest condition which is approximately 30% below the desired amount of late-successional habitat. The area is densely forested, has a high concentration of fuels, a high incident of shade-tolerant species and is less spatially complex making it less sustainable and highly vulnerable to high intensity fires. We support the Forest Service's efforts to reduce the threat of catastrophic stand-replacing wild fires and restore and maintain late–successional forest habitat for late-successional forest related species including the Northern spotted owl in the Mr. Ashland project area.

The EIS evaluates three action alternatives with various habitat restoration and fuel treatments activities within the project area. The project will also restore habitat for Threatened species listed under the Endangered Species Act (ESA). The action alternatives differ in the number of acres treated, the use of various silviculture practices and the number of temporary spur roads that will be constructed. The EIS identifies Alternative 2 as the Proposed Action, however, the Forest Service has not identified a preferred alternative at this time.

We have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to all the alternatives presented in the EIS. This rating and a summary of our comments will be published in the *Federal Register*. We have concerns with the impacts from ground-based silviculture treatments, the impacts from the temporary road spurs that will be constructed and the cumulative watershed effects. Additional information is needed on the impacts associated with the skid trails that will be constructed in riparian reserves and potential source water protection areas within and downstream of the project area. A copy of the rating system used in

conducting our review is enclosed for your reference. Our concerns are discussed further in our enclosed detailed comments.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact Mike Letourneau at (206) 553-6382.

Sincerely,

//s//

Christine Reichgott, Manager
NEPA Review Unit

Enclosures

Mt. Ashland Late-Successional Reserve Habitat Restoration and Fuels Reduction Project Draft EIS Detailed Comments

Ground-base Activities in Riparian Areas

We support the use of existing roads, skid trails and landings, and the use of Wet Weather Operation Standards for the operation of equipment during ground-based operations. However, we are concerned that there will be circumstances that require crossing a riparian area with a skid trail. While techniques such as water-barring and the use of mulch on the last 25' of the skid trails will minimize soil erosion, some sediment releases will occur in riparian areas. In addition, it will be necessary to add fill and install culverts to some of these riparian area skid trail crossings. While the EIS states that the riparian reserve will be restored including restoring pre-project channel configurations, disturbances in these areas will result in impacts to the riparian areas.

The EIS states that soil that leaves skid trails is unlikely to reach streams due to the filtering capacity of the riparian reserves. However, it does not discuss or evaluate the direct impacts these skid trails will have on streams associated with the addition and removal of fill and culverts. The EIS needs to discuss in detail the direct impacts associated with the construction and restoration of skid trails in riparian areas. In particular the EIS needs to evaluate the impacts from the addition and removal of fill and culverts used for skid trails in riparian areas.

Temporary Spur Roads

Temporary spur road construction will increase road densities, result in the harassment of wildlife and, increase edge habitat and habitat fragmentation. Increased edge habitat results in decreased interior forest exposing wildlife to increased sun and wind and potential vulnerability to external competition and predation. The project proposes to construct as many as 22 spur roads in the project area, two of which will cross streams and associated riparian vegetation. While the spur roads are temporary, and some areas will see some minor decreases in road density, road densities in the area are high. Post project road densities will still remain high (between 3.0 and 5.5 miles per square mile) and result in low habitat capability for deer, elk, marten and fishers. In addition, approximately 1.1 acres of late-successional forest and as much as 12 acres of mid-successional forest will be removed under the action alternatives due to the construction and use of the spur roads.

While the EIS states that the construction and use of the temporary spur roads will have minor impacts on habitat, impacts under Alternative 2 are the greatest due to the number of road spurs that will be constructed under this action alternative. To minimize impacts from the construction and use of road spurs we recommend that the Forest Service select the alternative that will have the least amount of road spurs (Alternative 5 with 9 road spurs) and avoid construction of road spurs that cross streams and riparian areas.

Cumulative Watershed Impacts

The proposed action alternatives will have varying degrees of cumulative watershed effects due to the amount of treated acres, acres treated with ground-based equipment and the number of temporary spur roads constructed. Alternatives 4 and 5 were designed to respond to some of the significant cumulative watershed effects. All the proposed action alternatives are consistent with Aquatic Conservation Strategy (ACS) objectives such as maintaining water

quality, retaining large trees and snags and the retention of coarse woody debris. The Klamath National Forest (KNF) Beaver Creek Ecosystem analysis also recommends reductions in road density and fuels within watersheds. Only Alternative 5 meets both the ACS and KNF Beaver Creek Ecosystem analysis objectives and recommendations, and consequently will have the fewest cumulative watershed effects. We recommend that the Forest Service select Alternative 5 for implementation to minimize the cumulative watershed effects in the project area.

Source Water Protection Areas

Public drinking water supplies and their source areas often exist on lands under federal management. EPA recognizes that providing high quality drinking water to protect human health is a high priority for land management agencies. Activities such as timber harvesting, and road building, may adversely affect waters that serve as sources of drinking water for communities. The EIS does not discuss whether there are source water protection areas within or downstream of the project area and whether the project will impact these areas.

The EIS needs to discuss the actions were taken to identify all federally-regulated and state-regulated source water protection areas, within and downstream of the project area. If source water protection areas will be impacted by the proposed project, the EIS needs to discuss what those impacts may be and the measures that would be taken to protect them.