

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

November 2, 2006

James Pena, Forest Supervisor 159 Lawrence Street P.O. Box 11500 Quincy, CA 95971-6025

Subject: Final Environmental Impact Statement for Slapjack Project, Butte and

Yuba Counties, California (CEQ# 20060389)

Dear Mr. Pena,

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) 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.

Based on our review, we remain concerned with the cumulative watershed effects of the project and the effects of roads. The proposed action, combined with future foreseeable private timber harvests, could increase the level of disturbance to 146% to 170% of the cumulative watershed effect Threshold of Concern (TOC) in five watersheds. Given these already highly disturbed subwatersheds, we continue to recommend consideration of less disturbing logging methods and modification of Defensible Fuel Profile Zone (DFPZ) design to minimize additional soil disturbance to the maximum extent feasible. We also believe it is important that the Forest Service evaluate the cumulative impacts of DFPZ construction and maintenance, road construction, and timber harvests over the entire Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project area. Of specific interest are potential cumulative impacts to water quality, habitat fragmentation, and noxious weed proliferation.

We commend the proposed road and restoration projects, especially the closure and decommissioning of roads and restoration projects that will reduce sediment sources and benefit fish and aquatic systems. We urge closure and decommissioning of the roads as soon as possible, instead of waiting until completion of Slapjack Project or for completion of the Off-Highway Vehicle (OHV) designation process. At a minimum, we recommend closure and decommissioning of roads that are unlikely to be designated in the OHV network or are causing significant impacts.

We appreciate the opportunity to review this FEIS. We are available to discuss our comments. If you have any questions, please call Laura Fujii, of my staff, at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/S/ Nova Blazej for Enrique Manzanilla, Director Communities and Ecosystems Division