



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

July 27, 2007

Chris Knopp
Acting Forest Supervisor
Plumas National Forest
159 Lawrence Street
P.O. Box 11500
Quincy, CA 95971-6025

Subject: Draft Environmental Impact Statement for Sugarberry Project, Plumas,
Sierra, and Yuba Counties, California (CEQ# 20070239)

Dear Mr. Knopp,

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) 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 our NEPA review authority under Section 309 of the Clean Air Act.

We commend the Forest Service for 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. Additionally, we support selection of Alternative C, which would reduce disturbance in sub-watersheds that are over or approaching the Threshold of Concern for Cumulative Watershed Effects. While we commend the project for these features, we are concerned with the cumulative effects of the project, especially within the context of the Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project, the need to address adverse effects of the high-density road system, and potential impacts to late-successional forest species. Based on our review, we have rated the Sugarberry Project as Environmental Concerns – Insufficient Information (EC-2). A *Summary of EPA Rating Definitions* is enclosed.

For the Final EIS (FEIS), we urge inclusion of a more detailed cumulative impact analysis, closure and decommissioning of roads with identified resource issues, and evaluation of a modified alternative which would maintain canopy cover and reduce habitat fragmentation. These additional design features would more aggressively address adverse water quality effects of the high-density road system and reduce cumulative impacts to late-successional forest species.

We appreciate the opportunity to review this DEIS. We are available to discuss our comments. When the Final EIS is released for public review, please send one copy to the above address (mail code: CED-2). If you have any questions, please call me at 415-972-3846 or Laura Fujii, of my staff, at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/s/ by Laura Fujii for

Nova Blazej, Manager
Environmental Review Office

Enclosures:

Summary of EPA Rating Definitions

Detailed Comments

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE SUGARBERRY PROJECT, JULY 27, 2007.**

Cumulative Impact Analysis

Provide a more detailed cumulative impact analysis of the Sugarberry Project within the context of the HFQLG Pilot Project. The Sugarberry Project is part of the Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project (HFQLG Pilot Project). The HFQLG Pilot Project is designed to demonstrate the effectiveness of Defensible Fuel Profile Zone (DFPZ) construction and maintenance, group selection and individual tree selection timber management prescriptions, avoidance or protection of specified areas, and a riparian restoration program (p. 1-3). The HFQLG Pilot Project is also intended to contribute to the stability and economic health of rural communities by providing an adequate timber supply (p. vi). EPA expressed concerns with the HFQLG Pilot Project due to potential cumulative impacts of DFPZ construction and maintenance, water quality impacts from road construction, increased habitat fragmentation, and the potential for noxious weed proliferation.

A number of HFQLG projects are already underway or completed in the Feather River Ranger District such as the Watdog, Slapjack, Upper Slate, and Lower Slate projects (Appendix G-6, p. G-X). In addition, other HFQLG projects are in progress throughout the region--Phoenix Project (Tahoe National Forest), Cone Crater (Lassen National Forest), North 49 (Lassen National Forest), and Basin Group Selection project (Plumas NF). EPA continues to have significant concerns with the cumulative effects of DFPZ construction and HFQLG fuel management actions.

Recommendations:

We recommend the FEIS provide a summary of HFQLG projects and the status and results of effectiveness monitoring. We recommend this summary include a list of HFQLG projects approved and implemented; the number of acres logged by specific prescriptions; and current data on the effectiveness of DFPZ and fuel management prescriptions in reducing fire intensity, increasing community and fire fighter safety, providing significant economic benefits for local communities, and moving the forest towards a more fire-resilient heterogeneous forest.

The FEIS should include a more detailed evaluation of the cumulative impacts of DFPZ construction and maintenance, road construction, and timber harvests over the entire HFQLG Pilot Project area. Of specific interest are potential cumulative impacts to water quality, cumulative watershed effects, habitat fragmentation, and noxious weed proliferation. We recommend that the Forest Service refer to the Cumulative Impact Guidance jointly prepared by the California Department of Transportation (Caltrans), the Federal Highway Administration (California Division) and EPA Region 9 in the preparation of the cumulative impacts analysis for this project. While this guidance was developed for transportation projects in California, the principles and the 8-step process in this guidance can be applied to other types of projects. The guidance can be found at http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm.

Redesign treatments to avoid unstable ground associated with legacy mining to avoid cumulative watershed effects. The DEIS states there are areas of unstable ground associated with legacy mining, such as in the Howland Flat, St. Louis and Pioneer Pit areas, which could be further destabilized by mechanical activity (p. 3-121). Project activities could increase the risk of cumulative watershed effects even with the implementation of Best Management Practices.

Recommendation:

We recommend the Forest Service redesign treatment units to avoid the highly unstable ground associated with legacy mining.

Provide specific information on the fuel reduction and timber management activities on adjacent private and community lands. Incorporate these projects into the cumulative impacts analysis. The project area is interspersed with private land and the communities of La Porte, Strawberry Valley, American House, and Clipper Mills; with many scattered homes and structures in the Wildland Urban Interface. The private lands are heavily managed for timber production, and fuel reduction projects are being designed by the Fire Safe Councils of Plumas, Sierra, and Yuba Counties.

Recommendations:

The FEIS should provide specific information on fuel reduction and timber management activities on adjacent private and community lands. For example, describe and evaluate the fuel reduction projects being designed by the Fire Safe Councils, community efforts to make their communities fire safe, and fuel management projects on adjacent private timberlands. This evaluation should describe how these separate fuel reduction projects, in conjunction with HFQLG projects, are being integrated on a landscape-scale to ensure an effective regional system of DFPZ and move the forest towards a more fire-resilient heterogeneous forest. This evaluation should also be incorporated into the cumulative impacts analysis.

Road Effects

Close and decommission problem roads as soon as possible. We commend the Forest Service for decommissioning 4.7 miles of road and proposing watershed improvement projects (replacement of culverts, meadow restoration) to improve fish passage and stream and meadow conditions. However, the DEIS states that the project would not change the road density (p. 3-170), which in a majority of subwatersheds exceeds the desired density for minimizing road impacts on aquatic and riparian environments and associated terrestrial wildlife (p. 3-109). Watersheds in the analysis area have also experienced changes in stream morphology, water quality and aquatic and riparian habitat quality due to legacy hydraulic mining, timber harvest and associated road construction, particularly in heavily managed private timberlands (p. 3-108).

Recommendations:

Given the high road density and disturbed watersheds, we urge closure and decommissioning of roads with identified resource issues as soon as possible, instead of waiting until completion of the Off-Highway Vehicle (OHV) route designation process (p. 3-120). At a minimum, we recommend rapid closure and decommissioning of roads that are unlikely to be designated in the OHV network or are causing significant impacts. The FEIS should describe and commit to a specific schedule for road closure and decommissioning.

The FEIS should provide information on road and restoration work being done by local communities and on private land within or adjacent to the Sugarberry Project area. Describe how these projects are integrated into, or complement, the Sugarberry Project objectives.

The DEIS states that most of the watershed improvement projects would be accomplished after completion of the timber harvest activities (p. 1-12). We recommend the FEIS provide assurances and enforcement measures to ensure the identified watershed improvements occur.

Impacts to Late-Successional Forest Species

Avoid and minimize adverse impacts to late-successional forest species. We are concerned with the potential impacts to late-successional forest species, especially in light of the existing high road density, the need for additional suitable habitat and canopy cover of 50%, and the cumulative effects of habitat alteration from other HFQLG projects. Projections for the HFQLG Pilot Project area indicate that 123,500 acres with more than 50% canopy cover could be reduced to 40% canopy cover (p. 3-199). Group and Individual Tree Selection harvests would also create 1-2 acres openings across the landscape. It is our understanding that late-successional forest species prefer a minimum canopy cover of 50%.

Recommendation:

We recommend evaluation of a modified alternative that combines features of the 2001 Sierra Nevada Forest Plan Amendment Record of Decision (2001 SNFPA ROD) with those of the Preferred Alternative C, which would maintain additional canopy cover and reduce habitat fragmentation. For instance, consider design features that would allow thinning of trees up to 20-inches in diameter at breast height (dbh) in Old Forest Emphasis Areas and Home Range Core Areas of sensitive species, 40 % canopy cover limits in east-side pine forest, 50 % canopy cover limits in red-fir forest, and thinning of trees up to 30-inches dbh in the Wildland Urban Interface (WUI) Defense Zones. Such a modified alternative may enhance the timber volume output and improve cost effectiveness of the originally eliminated 2001 SNFPA ROD Alternative D while also reducing potential adverse effects on old forest associated species in comparison with the Preferred Alternative C.

Existing Air Quality

Provide a description of existing air quality conditions. The DEIS provides a short description of the number of acres of the project in each county and Air Quality Management District. There appears to be little information on existing air quality conditions.

Recommendation:

We recommend the FEIS include additional information on existing air quality conditions in the description of Existing Conditions. For instance the FEIS should include information on the nearest monitoring stations, data from these stations, general wind direction, seasonal weather and air quality variations, attainment/non-attainment status with the National Ambient Air Quality Standards, presence of Class I or II sites (e.g., National Parks, wilderness), history of air quality violations, presence of sensitive receptors (schools, hospitals, nursing homes), de minimus levels for general conformity thresholds, and the need for a conformity determination.