

US EPA ARCHIVE DOCUMENT



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

January 2, 2015

Alessandro Amaglio
Regional Environmental Officer
FEMA Region IX
U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Subject: Final Environmental Impact Statement for the Hazardous Fire Risk Reduction Project; Alameda and Contra Costa, Counties, California. (CEQ# 20140345)

Dear Mr. Amaglio:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Hazardous Fire Risk Reduction Project; East Bay Hills, California. Our review is provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement for Hazardous Fire Risk Reduction Project, East Bay Hills, California and provided comments to the Federal Emergency Management Agency, on June 17, 2013. We rated the document EC-2, Environmental Concerns – Insufficient Information due to our concerns regarding potential impacts to natural resources and herbicide use. Based on our review of the FEIS, we appreciate that many of the concerns identified in our comments on the DEIS have been addressed. Our remaining concerns are described below.

EPA remains concerned with the presumption that the project areas would be able to naturally revegetate. Page 5.3-5 states that few studies if any have been completed to predict wood chip decomposition rates. With some areas experiencing up to 24 inches of eucalyptus wood chips as well as herbicide to reduce non-native reoccurrence, the likelihood that the restoration of the natural environment will also require replanting of desired native plants and trees is reasonable. We recommend that the ROD include replanting as part of the mitigation requirement.

EPA supports the projects requirements to follow herbicide labels (as described on page 949 of Appendix Q). We recommend the ROD include buffer zones to protect water quality from herbicide application. We also recommend the ROD clearly identify which herbicide products would be approved for use in which areas.

EPA appreciates the clarification of the relationship between the proposed action and future development activities in the project area. Specifically we appreciate the addition of the statement on page 4.13-4, "No other development project associated with the LRDP is currently proposed in the vicinity of any of the FEMA project areas (UCB 2013)." Furthermore, we support the decision to amend the LRDP to eliminate any proposal for housing in the Hills Campus. This supports the conclusion that the project is not being proposed to facilitate additional development, while also avoiding near-term possible adverse impacts to biological and environmental resources.

EPA appreciates the communication between our offices and the opportunity to review this FEIS. Please send a copy of the Record of Decision to me at the address above (mail code ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

/S/ Connell Dunning for

Kathleen Martyn Goforth, Manager
Environmental Review Section