

US EPA ARCHIVE DOCUMENT



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

December 11, 2012

Randy Moore, Regional Forester
Reviewing Official
USDA Forest Service, Regional Office R5
1323 Club Drive
Vallejo, California 94592

Subject: Final Environmental Impact Statement for the Two-Bit Vegetation
Management Project, Siskiyou County, California (CEQ# 20120346).

Dear Mr. Moore:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Two-Bit Vegetation Management Project (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.

EPA has a unique responsibility in the NEPA review process. Under Section 309 of the Clean Air Act, EPA is required to review and publicly comment on the environmental impacts of major federal actions, including actions which are the subject of EISs. For more information on the NEPA compliance process go to:
<http://www.epa.gov/compliance/basics/nepa.html#eparole>.

EPA provided comments on the Draft Environmental Impact Statement (DEIS) in our letter dated June 21, 2010. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding: worker exposure to naturally occurring asbestos; air quality emissions; mitigation measures; climate change; and the lack of information regarding the decommissioning of roads, particularly in relation to the role of road decommissioning in meeting Total Maximum Daily Load (TMDL) requirements of the Klamath Basin. We appreciate the Forest Service's responses in the FEIS, which address our concerns regarding asbestos, TMDL requirements, and air quality. We continue to have some concerns regarding climate change and the decommissioning of roads, skid trails and landings.

Page 26 of the FEIS states that decommissioned roads would be "allowed to naturally regenerate." EPA recommends that the Forest Service consider whether more aggressive restoration efforts may be necessary to return such areas back into a natural forest state. We suggest that the Forest Service conduct a species specific evaluation of the

vulnerability of species in the project area to the impacts of climate change. This evaluation should determine present species' propensity for shifting to more suitable range elevations as conditions change. The findings of such an evaluation should be considered when planning timber harvest and restoration efforts, to maximize the likelihood that replanted species will be ones that that will endure these changes. We also suggest that the findings of such an evaluation should be considered when developing the "detailed closure and restoration plan for temporary roads and landings" referenced on page 446 of the FEIS.

EPA continues to support the use of thinning and prescribed underburning as important measures necessary to reduce the risk of fire, promote biodiversity, and restore natural ecological processes within the forest. We appreciate the hard work and dedication of the Happy Camp Ranger District Staff and the opportunity to review this FEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project, James can be reached at (415) 972-3852 or munson.james@epa.gov.

Please note as of October 1, 2012, EPA Headquarters is no longer accepting paper copies or CDs of EISs for official filing purposes. Submissions must be made through the EPA's new electronic EIS submittal tool: e-NEPA. To begin using e-NEPA, you must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy and two CD's of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

Sincerely,

/s/

Kathleen Martyn Goforth, Manager
Environmental Review Office