

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

October 25, 2010

Patricia A. Grantham, Forest Supervisor  
Klamath National Forest  
1312 Fairlane Road  
Yreka, CA. 96097-9549  
Attn: Big Pony Project

Subject: Draft Environmental Impact Statement for the Big Pony Project, Siskiyou County, California (CEQ# 20100362)

Dear Ms. Grantham:

The 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 Section 309 of the Clean Air Act.

The preferred alternative (Alternative 4) will manage vegetation through thinning and burning on approximately 3,328 acres across a 6,673 acre project area in the Klamath National Forest within the Goosenest Ranger District. EPA understands that the project is intended to protect permanent research plots and areas in the Wildland Urban Interface (WUI) while sustaining a diverse, fire-resilient ecosystem and functioning forest and watershed.

EPA acknowledges the importance of the project's goals of improving forest health, reducing fuel loading, and protecting wildlife, including the Northern Spotted Owl and Northern Goshawk. We 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. Project features such as road maintenance actions and limiting the amount of new road construction will help minimize adverse effects. We support the best management practices (BMPs) and resource protection measures included in the project design. For these reasons, we have rated the DEIS as Lack of Objections—LO (see enclosed "Summary of Rating Definitions").

EPA recommends full disclosure of information regarding air quality emissions. The final environmental impact statement (FEIS) should provide the attainment status in Siskiyou County for all National Ambient Air Quality Standards (NAAQS) and quantify the emissions from the Big Pony project, which may include PM<sub>10</sub> emissions from prescribed burns and construction related emissions from vehicles and diesel-powered machinery.

Prior to any prescribed burning, a smoke management plan must be submitted to Siskiyou County Air Pollution Control District (SCAPCD). The FEIS should include details regarding the smoke management plan that set forth how the project will comply with the SCAPCD regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

We appreciate the opportunity to review this DEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov, or contact me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager  
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions

cc: Siskiyou County Air Pollution Control District  
Wendy Dobrowolski, Goosenest Ranger District