

US EPA ARCHIVE DOCUMENT



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

Bradley Powell, Regional Forester
Pacific Southwest Region
R5 Regional Office
1323 Club Drive
Vallejo, CA 94592

Dear Mr. Powell:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the **Sierra Nevada Forest Plan Amendment** [CEQ #010007] in accordance with our responsibilities under 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 previously provided comments on the Draft EIS for this project in a letter dated August 11, 2000. In addition, EPA provided scoping comments in a letter dated January 19, 1999.

We rated the Draft EIS EO-2 (Environmental Objections – Insufficient Information) on Alternatives 6 and 8, which were identified as the two preferred alternatives at that stage. In the ROD, the Forest Service selected Modified Alternative 8. Modified Alternative 8 was not analyzed in the Draft EIS, but it includes elements from alternatives that were analyzed in the Draft EIS. Modified Alternative 8 represents a concerted effort to address fire and fuels concerns while maintaining viability of species of concern. The selected alternative includes a number of elements which represent significant improvements over the current set of Forest Plans, in particular a revised set of standards and guidelines which were developed through extensive consultations with resource agencies, particularly the Fish and Wildlife Service. EPA can offer qualified support for Modified Alternative 8, assuming the decision is not significantly altered during the appeal process, and receives full funding for implementation. We commend the Forest Service for selecting an alternative which seeks to preserve and improve old forest conditions over a large portion of the landscape, expands protection for riparian areas and aquatic resources, and addresses fire and fuels issues in a strategic fashion.

Our review of the FEIS revealed that a number of the issues raised in our comment letter on the Draft EIS were only partially addressed. This represents an ongoing difference of opinion over the appropriate scope of the Forest Plan Amendment. In many cases, our comments sought to draw attention to issues which have not been adequately addressed at a landscape scale, such as the need to reduce the size of the transportation system and the need to protect roadless resources. We continue to believe that these issues should be addressed at a landscape scale through collaboration with the full suite of interested stakeholders, rather than at a local Forest level with a limited set of stakeholders. We look forward to working with you and other interested stakeholders to resolve these and other issues, either through additional NEPA

planning and analysis, or through the interagency advisory and oversight institutions referenced in the ROD.

EPA is prepared to assist the Forest Service in developing an institutional framework for post-ROD implementation. We have been working with Forest Service staff to develop options, and we stand ready to negotiate a Memorandum of Understanding outlining our future role in implementation oversight, and more generally in interagency collaborative efforts to address issues which were deferred to the broader Framework for Conservation and Collaboration.

We appreciate the opportunity to review and provide comments on the Forest Plan Amendment. Please direct any future inquiries to Leonidas Payne or me. Mr. Payne can be reached by telephone at (415) 744-1571, or by e-mail at payne.leonidas@epa.gov.

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office