

US EPA ARCHIVE DOCUMENT



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

September 5, 2006

Dennis Stevens
Yuba River Ranger District
Tahoe National Forest
15924 Highway 49
Camptonville, CA 95922

Subject: Draft Environmental Impact Statement South Yuba Canal Maintenance Project,
Yuba River Ranger District, Tahoe National Forest (CEQ# 20060296)

Dear Mr. Stevens:

The Environmental Protection Agency (EPA) has reviewed the above project 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.

Based upon our review, we have rated this Draft Environmental Impact Statement (DEIS) as EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We are concerned with potential impacts to air quality, water quality and supply, and the lack of detailed information regarding project activities. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. Please send one copy of the Final EIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions, please contact Laura Fujii, the lead reviewer for this project, at (415) 972-3852 or at fujii.laura@epa.gov.

Sincerely,
/s/

Duane James, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating System
Detailed Comments

DETAILED COMMENTS

Evaluate the potential air quality impacts of proposed activities. The proposed action would remove hazardous trees located within 150 feet of either side of the centerline of the South Yuba Canal (canal). Trees would be felled and removed using tractor-based and helicopter-based logging systems which include skid trails, use of existing dirt roads, timber harvest landings, and pile burning of tree limbs, needles, and bole parts generated by the logging activity. The DEIS does not evaluate the potential air quality impacts of these activities.

Recommendation:

The Final Environmental Impact Statement (FEIS) should fully evaluate the potential air quality impacts of proposed activities. Of specific interest are potential impacts from smoke and fine particulate matter (PM10, PM2.5) which may be generated. The FEIS should describe the best management practices and mitigation measures that will be implemented to reduce potential air quality impacts.

Provide more specific information on existing water quality and potential impacts to water quality. The DEIS states that past damage to the canal has caused large water spills and associated erosion and sedimentation of streams down slope of the canal (pg. 63). In addition, channel alterations, down-cuts creating entrenched and confined stream channels, and effects of road drainage are adversely affecting project watersheds (pgs. 55 - 59). The magnitude of these past and present water quality effects, or of potential project effects, are not quantified or described in detail in the DEIS.

Recommendation:

Provide more specific and quantified information on existing water quality and potential impacts to water quality in the FEIS. For example, describe the extent of damage caused by past canal water spills on water quality and aquatic and riparian resources. The FEIS should provide a more rigorous, quantified evaluation of potential impacts to water quality from increased truck traffic on existing dirt roads, creation of new skid trails and harvest landings, and other logging activity.

Describe in more detail the South Yuba Canal water supply system and the potential for alternative water supply sources. Although the primary purpose of the canal is to transport domestic and agricultural water to western Nevada County users, the DEIS does not describe the source of this water supply, its water quality, or other aspects of the water supply system. Furthermore, the DEIS eliminates from further evaluation alternative logging periods because of the lack of a replacement water supply. Alternative logging periods would avoid impacts to sensitive species by shifting logging activities to periods outside the breeding season. The DEIS does not describe the replacement water supplies evaluated or the reasons why these sources are not available.

Recommendation:

The FEIS should describe in more detail the South Yuba Canal water supply system and the potential for alternative water supply sources. Include specific information on the current source of water, raw water quality and quantity, present and projected water supply demand, canal conveyance capacity, alternative water supply sources which have been considered, evaluated or are occasionally utilized (e.g., groundwater, other sources of surface water, water transfers), and system operations and practices such as demand-side management (e.g., water conservation, drip irrigation), water quality and quantity monitoring, and planning for system upgrades, expansions, or replacement.

Provide more specific information about project activities. The description of the Proposed Action and project alternatives does not include information on associated timber harvest landings, roads and routes that will be used, skid trails, pile burning, costs, funding sources, or the approximate number and size of trees that will be removed.

Recommendation:

Include in the FEIS more specific information in Chapter 2 Alternatives on associated timber harvest landings, roads and routes that will be used, skid trails, pile burning, costs, funding sources, and the approximate number and size of trees that will be removed. For instance, state whether only existing roads and landings will be used, how and where new landings and skid trails would be constructed, and whether project roads have existing erosion and drainage problems that may be exacerbated by project activities.