

US EPA ARCHIVE DOCUMENT



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

November 3, 2005

Mr. James Peña, Forest Supervisor
Plumas National Forest
159 Lawrence Street
P.O. Box 11500
Quincy, CA 95971-6025

Subject: Final Environmental Impact Statement for Watdog Project, Feather River Ranger District, Plumas National Forest, Butte and Plumas Counties, California (CEQ # 20050251)

Dear Mr. Peña:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced Final Environmental Impact Statement (FEIS) 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 reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the U.S. Forest Service (USFS) on August 11, 2005. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) because the extensive road system and past timber harvest activities have impaired watershed and riparian areas, rendering them susceptible to significant adverse cumulative affects. We recommended the selection of Alternative D, or a less harvest intensive Alternative B, as a way to reduce impacts to riparian resources, water quality, soils, and native plants (from noxious weeds). Alternative D also meets minimum habitat levels for forest carnivores, the California spotted owl, and the northern goshawk. We recommended Alternative D be identified as the environmentally preferable alternative.

EPA has reviewed the FEIS and notes the selection of Alternative B without change. As such, we continue to have concerns regarding cumulative impacts to water quality and riparian resources. As the FEIS notes, watershed and stream systems can tolerate certain levels of land disturbance but there is a point when land disturbances begin to substantially impact downstream channel stability and water quality (p. 3-64). Because 10 subwatersheds have riparian areas approaching or exceeding this critical point, EPA recommended selection of an alternative with less soil disturbance to prevent additional impacts from sediment. While standards, guidelines, and best management practices (BMPs) can help mitigate impacts in healthy watersheds, EPA is concerned that they may not be sufficient in impaired riparian areas, which are more limited in ability to absorb additional stressors.

We are pleased that the Record of Decision (ROD) includes fish passage improvements, which will open up an additional 3.5 miles of trout habitat. However, USFS did not sufficiently address EPA's comment as to whether designated beneficial uses of waters, including fisheries and spawning habitat, are threatened under existing conditions. We note that sediment degrades trout habitat, clogging spaces used for spawning, reducing depth of pools and runs for adults, and affecting prey visibility.

EPA recommended avoiding group selection in the four units with substandard ground cover where mastication is not proposed (unit numbers 73, 51, 65 and 98). We continue to recommend changes to the selected alternative which respond to the condition of these areas and lessen project impacts. The nature and extent of soil restoration that will occur in these four units remains unclear.

EPA expressed concern about short-term impacts from roads, since road decommissioning would not occur before 2008 when the Off-Highway Vehicle (OHV) route inventory and designation process is complete. We recommended identification and implementation of a road decommissioning timeline. While no implementation schedule was identified, EPA is pleased with the FEIS statement that roads creating unacceptable resource damage would be decommissioned before the Off-Highway Vehicle (OHV) route inventory and designation process is complete (p. 3-107). Since the DEIS indicated that roads proposed for decommissioning or closure are causing "significant resource impacts" (p. 139), we expect some road decommissioning to take place prior to 2008. An estimate of the extent and schedule for this road decommissioning should be included in the ROD.

EPA has continuing concerns regarding short-term impacts to old-forest species, especially forest carnivores. We recommend the Duncan Furbearer Interagency Workgroup management guidelines for road density be considered in the impact analysis to forest carnivores. The USFS should seek changes to the defensible fuel profile zones (DFPZ) and group selection areas to address what appears to be significant cumulative impacts to forest carnivores. The USFS should also make adjustments to the selected alternative to meet minimum suitable foraging levels for the California spotted owl and northern goshawk. The FEIS indicates these adjustments are possible while still meeting the project purpose and need.

We appreciate the opportunity to review this FEIS and ROD. If you have any questions, please contact me or Karen Vitulano, the lead reviewer for this project. Karen can be reached at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division