

US EPA ARCHIVE DOCUMENT



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

October 16, 2006

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

Subject: Draft Supplemental Environmental Impact Statement for Watdog Project, Feather River Ranger District, Plumas National Forest, Butte and Plumas Counties, California (CEQ # 20060359)

Dear Mr. Peña:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Supplemental Environmental Impact Statement (DSEIS) 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. Our detailed comments are enclosed.

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 as a way to reduce impacts to riparian resources, water quality, soils, and native plants (from noxious weeds). We noted that Alternative D was the only alternative to meet minimum habitat levels for forest carnivores, the California spotted owl, and the northern goshawk and recommended Alternative D be identified as the environmentally preferable alternative. Our concerns were not allayed upon review of the Final EIS, where we continued to express concerns regarding cumulative impacts to water quality and riparian resources (FEIS comment letter dated October 31, 2005).

The DSEIS presents additional analysis, especially of cumulative impacts, to several resources including hydrology, soils and vegetation. We commend the USFS for this additional analysis and improved organization. The proposed action and all alternatives are unchanged, however, and are concerns listed above remain. We have rated the DSEIS as Environmental Concerns - Insufficient Information (EC-2) and continue to recommend the selection of the less environmentally damaging Alternative D.

We appreciate the opportunity to review this DSEIS. When the Final SEIS is released for public review, please send one copy to the address above (mail code: CED-2). 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,

/s/

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:

Summary of EPA's Rating Definitions
EPA's Detailed Comments

Effectiveness of Water Quality Best Management Practices (BMPs) / Monitoring

The DSEIS states that the majority of risk from cumulative watershed effects is associated with the existing conditions of a highly disturbed landscape (p. 79). EPA has serious concerns regarding the effectiveness of BMPs in subwatersheds with such impaired existing condition. While properly implementing BMPs should minimize impacts under normal circumstances, it is not clear that they would be as effective under these highly disturbed conditions.

The DSEIS references post-project monitoring of BMPs (p. 72) to ensure that beneficial uses of waters are maintained and that state water quality objectives are met, but there is no further reference to this monitoring program. BMPs for the project are listed in Table B-1, but this table is deceiving because it also includes water quality objectives, many for which no BMPs are associated. For example, Measure 1.19 – Streamcourse and aquatic protection states it will “conduct management actions within areas in a manner that maintains or improves riparian and aquatic values” but does not identify what actions will be taken to achieve this. Many of the mitigation measures listed in Table are actually objectives and do not identify specific actions.

Mitigation measure 7.8 states that water quality monitoring will occur to determine base-line conditions for comparison to established water quality standards, but there is no indication of what actions will be taken if standards are not met.

Recommendation:

In the Final Supplemental Environmental Impact Statement (FSEIS), provide details regarding the post-project monitoring of BMPs including timing and frequency of monitoring, responsible person(s), and actions that will be taken upon review of monitoring results. For Table B-1, we recommend listing the water quality objectives as subheadings and then listing the BMPs that will occur in order to achieve these objectives under them. For example, measure 5.3 includes both an objective and the mitigation measure. The objective is to limit turbidity and sediment production from compaction, rutting, and runoff concentration from tractor use. The mitigation measure to achieve this is prohibiting the use of mechanical equipment in wetlands and meadows for the project. Reformatting Table B-1 in this manner will clearly identify the water quality objectives and also clarify what specific mitigation measures will occur for the project. All mitigation measures should be included in the ROD.

EPA continues to recommend a less environmentally-damaging alternative be selected for this project if an action alternative is selected. As currently formulated, Alternative D is the least environmentally damaging while meeting the project purpose and need.

Impacts from Roads

Roads modify drainage networks and accelerate erosion, changes that can be dramatic and long-lasting and degrade water quality and aquatic habitat (p. 76). The project area has a high road density, high road density near streams, and high stream-crossing density (p. 76), and modeling results indicate that roads and the high road density are major influences on existing poor

watershed condition (p. 77). These conditions clearly show the necessity for road decommissioning, and all the action alternatives propose to decommission 12.9 miles of roads (FEIS p. 2-15). While this decommissioning is commendable, the document does not indicate how the decommissioning of 12.9 miles will affect road density in the project area. The FEIS states that road density in the majority of subwatersheds exceeds the desired condition established to minimize road impacts on aquatic and riparian environments (FEIS p. 3-62).

Recommendation:

In the FSEIS, state whether the road density in the subwatersheds will continue to exceed the desired condition to minimize road impacts on aquatic and riparian environments under each project alternative. Because of the existing highly disturbed nature of the watersheds due largely to high road density, EPA recommends against the establishment of new system roads for the project so that full road decommissioning benefits can be realized. Alternative D will have no new road construction (p. 141) and is preferable.

Thresholds of Concern Calculations

The DSEIS contains very different threshold of concern (TOC) calculations for subwatersheds and near-stream sensitive areas than in the FEIS. The DSEIS states that streams in the project area were not surveyed for condition (p. 77), so the cause for these changes is not clear. In addition, data in Table S 3-23 doesn't match the data in Tables S3-22, S3-21, and S3-20, especially for Alternative D.

Recommendation:

In the FSEIS, explain what factors contributed to the large change in TOC calculations from the FEIS to the DSEIS. Reconcile data inconsistencies in Table S3-23 as indicated above.

Impacts to Soils

In our comments on the DEIS, we recommended group selection be avoided in unit numbers where soils do not currently meet minimum standards. The FEIS stated that unit #73 has soil cover less than minimum standards under existing conditions, and units #51, #65 and #98 are within 10% of the minimum standard. The DSEIS states unit #44 barely meets forest standards for effective ground cover, and #39, #43 and #46 have similar conditions. It is not clear what changes have occurred since the FEIS to explain this, or if it is the numbering systems that have changed and they represent the same areas. The unit numbers in Tables 3-23 and 3-24 in the FEIS do not include these new numbers. Additionally, the discussion on page 112 is confusing since it references the Slapjack Project and the use of herbicides and skyline methods, which have not been discussed previously.

The DSEIS includes additional information regarding cumulative effects on soil cover and states that an average of 27% reduction in soil cover generally occurs in group selection and thinning units (p. 103). The DSEIS does not indicate which units would be below standards with a 27% soil cover reduction.

Recommendation:

In the FEIS, explain the differences in the soil analysis unit numbers from the FEIS to the DSEIS. Clarify whether the conclusions on page 112 are applicable to the Watdog project.

In the FEIS, identify the unit numbers expected to fall below minimum standards with a 27% reduction in soil cover for each action alternative. We continue to recommend the avoidance of group selection in units with substandard soil cover. Alternative D proposes less group selection treatments and proposes mastication instead of thinning for some units, reducing impacts to soils and even improving soils in mastication units.

Impacts to Wildlife

In our comments on the DEIS, we expressed concern for the impacts to old-forest species especially forest carnivores. The DSEIS provides some additional information on impacts to these species, however this has not dispelled our concerns. In the discussion of the impacts from road density on forest carnivores, the DEIS cited the road density recommendation of the Duncan Furbearer Interagency Workgroup of less than 2 miles/square mile for moderate impacts to forest carnivores. It is not clear how an existing average road density of 6.6 miles/square mile for the project area would not be considered a significant impact to these species, and how the addition of new roads under the preferred alternative would not be cumulatively significant.

We continue to recommend an alternative that considers the importance of old-forest species in the short term, so that populations will be robust enough to enjoy the benefits of any long-term improvements. The analysis for Alternative D shows substantial reduction in impacts to foraging areas surrounding goshawk protected activity centers (PACs) over the other alternatives (p. 150). Alternative D has the least effect of reducing California Spotted Owl (CSO) habitat below minimum levels suitable for foraging (p. 154). All action alternatives would reduce canopy cover below high suitable habitat for forest carnivores denning and resting, but Alternative D would at least provide canopy cover for all DFPZ units above minimum forage/travel levels. This is not true for the preferred alternative.

Recommendation:

The FEIS should address how conclusions regarding impacts to forest carnivores were drawn in light of the Duncan Furbearer Interagency Workgroup recommendation mentioned above. If an action alternative is selected, we recommend Alternative D as the least impacting to old-forest species.

Noxious Weeds

In our comments on the DEIS, we expressed concerns regarding the spread of noxious weeds in group selection units. It appears that additional mitigation has been added to the DSEIS which includes 1) revisit and hand pull known sites of spotted knapweed in project area, 2) revisit and hand pull known sites of French and Scotch Broom in project area, 3) treat barbed goatgrass (Appendix B, p. 11).

Recommendation

Since the average recovery period for disturbed sites is 25 years (p. 66), we continue to

recommend the selection of Alternative D which proposes less group selection acreage than Alternative B and therefore reduces the risk of noxious weed spread on the Forest. We commend U.S. Forest Service (USFS) for the additional noxious weed mitigation. This mitigation should be identified in the project Record of Decision (ROD).

Air Quality

In our comments on the DEIS, we recommended the air impact analysis include emissions from construction equipment involved in timber operations, road building and decommissioning as well as prescribed burns. We commend the USFS for including additional emissions estimates from timber operations in the DSEIS. The air quality analysis also includes references to general conformity under the Clean Air Act (CAA) section 176(c) and 40 CFR part 51 subpart W. The FSEIS should provide this reference and indicate the regulatory source of the “current allocation of 50 tons per year for each pollutant” (p. 15). In addition, the DSEIS references mitigation in the FEIS to reduce impacts from prescribed burns, but does not identify mitigation applicable to construction equipment. Where possible, construction mitigation should be employed.

Recommendation:

In the FEIS, include the regulation citation for general conformity and clarify the regulatory source of the 50 ton per year pollutant allocation.

Consider the following construction mitigation and include them in timber contract specifications:

- Tune and maintain all diesel-powered construction equipment and shut off when not in direct use. Employ periodic, unscheduled inspections to limit unnecessary idling.
- Prohibit engine tampering to increase horsepower, except when meeting manufacturer’s recommendations.
- Reduce construction-related trips of workers and equipment, including trucks.
- Lease or buy newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment’s total horsepower.