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

July 14, 2006

Sam Frink
Weaverville Ranger District
United States Forest Service
PO Box 1190
Weaverville, CA 96093

Subject: Final Environmental Impact Statement (FEIS) for the Browns Project (CEQ# 60252)

Dear Mr. Frink:

The U.S. Environmental Protection Agency (EPA) has reviewed the document referenced above. Our review is 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 commented on the Draft Environmental Impact Statement (DEIS) for this project on June 10, 2005, rating the proposed project as Environmental Concerns, Insufficient Information (EC-2). EPA expressed concerns with the proposed alternative's (Alternative 3) water quality impacts from erosion as well as impacts to old-growth and late-growth successional forests. Upon our review of the FEIS, we have continuing concerns with the proposed project.

In our comments on the DEIS, we recommended that Alternative 4 be carried forward as the preferred alternative. Alternative 4 would prevent new road construction in Little Browns Creek, and therefore, not result in an increase in Equivalent Roaded Acres (ERA) as under Alternative 3 (FEIS, p. 99). The FEIS does not select Alternative 4 because it treats a reduced number of acres adjacent to private property (FEIS, p. 3). However, the DEIS notes that Alternative 4 would have the same effect on the fire regime condition class as Alternative 3. No further information is provided to determine the increased level of risk from selection of Alternative 4 (DEIS, p. 4-6).

In our DEIS comments, we also requested additional information on air quality impacts and associated mitigation measures. The Response to Comments in the FEIS does not address our concerns. In particular, response F-11 notes that because air quality impacts were not identified during scoping for the project, the project's impacts on air quality are not analyzed (p. J-3). NEPA requires that all resource impacts that could result from a project be analyzed and

made available for public review. Furthermore, the analysis of cumulative air quality impacts includes only impacts from smoke (p. 78). As stated in our comments on the DEIS, operations of the proposed tractor and cable yarding, when added to the effects of other timber sales, may have cumulative impacts to air quality that should be analyzed and mitigated.

Due to our ongoing concerns with the proposed alternative, we recommend that monitoring for air quality impacts and watershed impacts be put into place before project implementation. We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at 415-972-3988 or Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847 or allen.summer@epa.gov.

Sincerely,

/S/
Duane James, Manager
Environmental Review Office

Main ID # 4549