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

September 8, 2009

Patricia A. Grantham
Forest Supervisor
Klamath National Forest
1312 Fairlane
Yreka, CA 96097-9549

Subject: Draft Environmental Impact Statement (DEIS) for the Eddy Gulch Late-Successional Reserve Fuels/Habitat Protection Project, Siskiyou County, CA (CEQ# 20090246)

Dear Ms. Grantham:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above-referenced project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Salmon River and Scott River Ranger Districts of the Klamath National Forest are proposing vegetation management for the purpose of protecting existing and future late-successional habitat and to reduce threat from wildfires to local communities and watersheds that may occur inside and/or outside the Eddy Gulch Late-Successional Reserve. The Proposed Action (Alternative B) would involve 25,969 acres of landscape-level treatments located in the Klamath National Forest.

EPA acknowledges the importance of project goals to improve forest health, reduce fuel loading, and protect communities and watersheds from wildfire threats. We support the best management practices described in the DEIS, such as minimizing new road construction and decommissioning roads after project activities have taken place to help reduce adverse environmental effects.

We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). We recommend that the Final Environmental Impact Statement (FEIS) provide additional information concerning a smoke management plan, worker exposure to naturally occurring asbestos, the wildland-urban interface (WUI), and noxious weeds. Please see the enclosed Detailed Comments for a description of these concerns and our recommendations.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). In the meantime, we are available to discuss our comments. If you have any questions, please contact Jennifer Gagnon, the lead reviewer for this project, at (415) 947-4121 or Gagnon.Jennifer@epa.gov, or me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures:
Summary of EPA Rating Definitions
Detailed Comments

cc: Eddy Gulch LSR Project, c/o RED, Inc. Communication

Air Quality

Provide a detailed smoke management plan describing the Siskiyou County Air Pollution Control District (SCAPCD) Smoke Management Program. The U.S. Environmental Protection Agency (EPA) acknowledges the need to reduce fuel, which may lead to a reduction of emissions from wildfires. Emissions from wildfires can be a major contributor of PM_{10}, $PM_{2.5}$, and CO (page 3-54, lines 5-6). The DEIS states that the Forest Service would coordinate with the appropriate air quality regulatory agencies during the planning and implementation of its resource management activities that affect air quality (page 1-21, lines 7-16).

> ***Recommendation:***
> The FEIS should include a detailed smoke management plan describing the SCAPCD's regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

Naturally Occurring Asbestos

Limit exposure to Naturally Occurring Asbestos. The DEIS states that asbestos can be introduced into the air by activities that include road construction, reconstruction, or maintenance on roads underlain by ultramafic rock (3-159, lines 5-6). The DEIS also states that ultramafic rock is concentrated in the southwest corner of the Assessment Area, and acknowledges the presence of serpentine geology in the project area (page 3-159, lines 7-9). Although serpentine soils may be limited, it is important to protect human health by limiting the exposure of workers to serpentine soils that may introduce airborne asbestos during vegetation management activities. Very low levels of asbestos in soil can generate airborne asbestos at hazardous levels. We are concerned about the potential exposure of workers to naturally occurring asbestos.

> ***Recommendations:***
> EPA recommends that the Forest Service determine whether or not naturally occurring asbestos is present in treatment units or along project access routes. If naturally occurring asbestos is found to be present, the FEIS should provide information on exposure mechanisms and assess the potential for exposure to elevated levels of airborne asbestos from proposed activities.
>
> EPA recommends that the Forest Service review the asbestos occurrence information on the California Geological Survey website: http://www.consrv.ca.gov/cgs/minerals/hazardous_minerals/asbestos/index.htm and the California Air Resources Board (CARB) regulations and guidance at: http://www.arb.ca.gov/toxics/asbestos/asbestos.htm. The CARB website addresses California's Asbestos Airborne Toxic Control Measures for Surfacing Applications, which apply to unpaved roads.
> EPA also recommends that the Forest Service review the recommendations presented in the Department of Toxic Substances Control report, "Study of Airborne Asbestos from a Serpentine Road in Garden Valley, California" at:

http://www.dtsc.ca.gov/loader.cfm?url=/commonspot/security/getfile.cfm&pageid=33546.

The FEIS should identify and include commitments for measures that can be implemented to protect human health from naturally occurring asbestos, if appropriate, and include this discussion in the FEIS.

Wildland-Urban Interface

Describe how the Community Wildfire Protection Plan relates to the proposed project.
A main component of the purpose and need for this project is to provide fire protection for the wildland-urban interface (WUI) (page 1-11, lines 18-19). The Healthy Forest Restoration Act (HFRA) encourages the development of Community Wildfire Protection Plans (CWPPs) under which communities designate their WUIs and the locations where fuel reduction projects may take place. A summary of the Salmon River CWPP is provided in the DEIS (page 2-4, line 31 through page 2-5, line 10).

Recommendations:
The FEIS should further describe actions that will be taken by the Forest Service and the communities to ensure fire protection efforts are consistent, complementary, and fully integrated with the preferred alternative. For instance, describe whether local building and fire safety ordinances are consistent with the effort to reduce and minimize excessive fuels.

Noxious Weeds

The DEIS states that a total of 24 high-priority weeds are found on the Klamath National Forest Noxious Weed List (page 3-205, lines 7-8). A Weed Risk Assessment identified this project as having a moderate to high risk of introducing or spreading noxious weeds (3-209, lines 36-37). The DEIS states that the Forest Service will implement prevention, control, and monitoring activities to prevent noxious weeds from infesting areas in the Project Area (page 2-30, lines 1-27). The Forest Service identifies several noxious weed resource protection measures (RPMs) for each treatment activity. For example, if noxious weeds were found in the area during prescribed burn treatments, there would be an omission of prescribed burn treatments and fireline construction within weed populations, cleaning of all equipment before entering treatment units, post-treatment surveys, site-specific surveys, and monitoring of noxious weed sites to ensure that natural vegetation has recovered from the disturbance (page 3-211, lines 29-33). While these measures are commendable, the DEIS does not specifically state what measures the Forest Service would take to manage or eradicate noxious weeds if they were found at the project sites.

Recommendation:
The Forest Service should indicate precisely what treatment methods would be used if noxious weeds were found, and any potential impacts they could cause. We also suggest that the Forest Service consider incorporating noxious weed management or eradication treatments as part of the project design.