UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

October 25, 2010

J. Sharon Heywood, Forest Supervisor
Shasta-Trinity National Forest
3644 Avtech Parkway
Redding, CA 96002
Attn: Gemmill Thin Project

Subject: Draft Supplemental Environmental Impact Statement for the Gemmill Thin Project, Trinity County, California (CEQ# 20100360)

Dear Ms. Heywood:

The Environmental Protection Agency (EPA) has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the above 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 Section 309 of the Clean Air Act.

Developed during the administrative appeals process, the preferred alternative (Alternative 4) will thin vegetation on approximately 1,618 acres in the Shasta-Trinity National Forest within the Chanchelulla Late-Successional Reserve (LSR). EPA understands that the project is intended to improve the conditions in the LSR and reduce fuels in the Wildland Urban Interface (WUI). We acknowledge the importance of the project's goals of improving forest health, reducing fuel loading, and protecting communities from wildfire risk.

We have rated the DSEIS as Environmental Concerns— Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). EPA previously reviewed the Draft Environmental Impact Statement (DEIS) on November 10, 2008 and the Final Environmental Impact Statement (FEIS) on June 1, 2009. In our FEIS letter, we had remaining concerns regarding the criteria for determining the largest and healthiest trees that would not be removed as part of the thinning project. The DSEIS states that "in all treatment units, the largest and healthiest trees would be retained, and no trees more than 150 years old will be removed" (pg. 14). It continues to be unclear what the threshold would be to determine which trees would be classified as "largest and healthiest" as well as how a tree will be determined to be over 150 years old. Who will make this determination? Under Alternatives 1 and 4: "Few trees harvested would be greater than 18 inches DBH, however, trees over this size may be removed when they are in direct competition with a larger tree" (pg. 29). What is the definition of "direct competition" and how is it measured? Do the thinning treatments target specific species of trees? The Purpose and Need of the

Gemmill project includes a return to desired conditions for the project area, described as a natural landscape that is resilient to fire events with fuel loading smaller than 5 tons per acre (pg. 4-5). EPA believes that more information should be provided as to what trees will be harvested and how the Forest Service will know when they are successful in achieving the stated Purpose and Need. We recommend that the FEIS and Record of Decision identify specific guidelines such as leaving a minimum number of trees per acre, leaving trees greater than a specific DBH, or committing to a specific canopy height for the different treatment units.

We appreciate the opportunity to review this DSEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov, or contact me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions

cc: Bobbie DiMonte Miller, Shasta-Trinity National Forest