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

May 8, 2006

Jeff Leach
Sierraville Ranger District
P.O. Box 95
Sierraville, CA 96126

Subject: Phoenix Project Draft Environmental Impact Statement (EIS), Tahoe National Forest, California [CEQ #20060091]

Dear Mr. Leach:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document 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.

The purpose of the proposed project is to treat poor forest health and high fire hazard conditions, develop a network of Defensible Fuel Profile Zones (DFPZs), restore aspen stands, and improve the condition of existing roads on National Forest land.

We have rated this Draft EIS as EC-2 – Environmental Concerns-Insufficient Information (see the enclosed "Summary of Rating Definitions"). Our rating is based on our concerns about the proposed project's potential impacts to watershed resources, air quality, and noxious weeds. We recommend the Final EIS provide additional information regarding these impacts and include additional measures to avoid or mitigate them. Our detailed comments are enclosed.

The Proposed Phoenix Project is part of the Herger-Feinstein Quincy Library Group (HFQLG) Forest Recovery Act Pilot Project. On November 18, 1999, EPA expressed environmental objections to the Quincy Pilot Project based on potential water quality impacts from road construction, increased wildlife habitat fragmentation, and the potential for noxious weed proliferation. We remain concerned, especially in regard to adverse watershed effects of the existing road system.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 972-3988, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/S/
Duane James, Manager
Environmental Review Office

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Enclosures: Summary of Rating Definitions
EPA's Detailed Comments

Phoenix Project Draft EIS
EPA Comments – May, 2006

Watershed Impacts

According to the Draft EIS (pp. 3-94 to 3-102), several sub-watersheds that currently have Equivalent Roaded Area (ERA) to Threshold of Concern (TOC) ratios greater than 0.85 would result in even higher ERA/TOC ratios under the Proposed Alternative. Some ERA/TOC ratios would equal or exceed 1.0. These ratios indicate the potential for adverse cumulative watershed affects. While the proposed project includes numerous best management practices, it is unclear whether all reasonable measures have been included in this alternative to reduce or avoid cumulative impacts to the extent possible.

> **Recommendation:** In sub-watersheds that already have ERA/TOC ratios of equal to or greater than 0.85, the Forest Service should consider avoiding further increases to ERA/TOC ratios while meeting the stated project purposes. Avoiding higher impact individual treatments or restructuring the project to include measures such as additional decommissioning of roads in these areas could reduce the magnitude of cumulative impacts that are projected under the Proposed Alternative.

Air Impacts

The Draft EIS does not provide information regarding existing air quality or the projected impacts to air quality from the proposed project.

> **Recommendation:** The Final EIS should describe existing air quality in the project vicinity. It should include a discussion of the National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments applicable to air quality in the project area.

Air pollutant emissions will result from several proposed activities including burn and mechanical treatments; road building, maintenance, and decommissioning; and logging activities. These emissions will include smoke, vehicle emissions, and particulates from ground disturbance and road use.

> **Recommendation:** The Final EIS should estimate criteria pollutant emissions from all activities and roads related to the project and alternatives. The Final EIS should discuss impacts to the NAAQS and PSD increments from projected emissions of all aspects of the project and alternatives, including support activities such as vehicle traffic, as well as cumulative emissions from other sources in the project area.

PSD increments are highly protective of air quality in Class I areas such as wilderness areas and national parks. The PSD increments for PM10 in Class I areas are 4 ug/m^3 and 8 ug/m^3, for the

annual and 24-hour standards, respectively; and the nitrogen dioxide annual increment is 2.5 ug/m^3.

> **Recommendation:** The Final EIS should identify all Class I PSD areas located within 100 kilometers of the proposed project site, and discuss potential impacts to Class I PSD areas, including visibility impacts.

The Draft EIS does not identify measures that would be used to minimize air pollutant emissions from project activities and roads.

> **Recommendation:** The Final EIS should identify all mitigation measures that will be implemented to reduce air pollutant emissions from the project. Fugitive source controls include water application or use of chemical binders or wetting agents on roads being intensively used during site-specific activities. The Final EIS should discuss whether these binding or wetting agents would be used, how they would mitigate air pollutant emissions from the project, and any effects they would have on biological or watershed resources.

> **Recommendation:** We recommend the following measures be conditions of the project to reduce diesel particulates, carbon monoxide, hydrocarbons, and nitrogen oxides associated with project activities:

- Engines do not idle for more than five minutes;
- Engines are not tampered with in order to increase engine horsepower; and
- Engines include particulate traps, oxidation catalysts and other suitable control devices on all equipment used at the project site.

<u>Noxious Weeds</u>

The Draft EIS (p. 3-127) indicates that all equipment coming from areas infested with noxious/invasive-exotic weeds would be cleaned before entering the project area and Tahoe National Forest. In light of the pervasiveness of "C" rated noxious weeds, equipment would be vulnerable to contamination with such weeds, even where an infestation might not be recognized.

> **Recommendation:** The Forest Service should consider requiring cleaning of all equipment coming into Tahoe National Forest and the project area as a precaution against contamination of these areas with "C" rated noxious weeds.