



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

February 14, 2014

Patricia A. Grantham  
ATTN: Lisa Bousfield  
Happy Camp Oak Knoll Ranger District  
63822 Highway 96, P.O. Box 377  
Happy Camp, CA 96039

**Subject:** Notice of Intent to prepare a Draft Environmental Impact Statement for the  
Crawford Vegetation Management Project, Klamath National Forest.

Dear Ms. Grantham:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent (NOI) for the Crawford Vegetation Management Project, Klamath National Forest. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

EPA agrees with the Forest Service decision to prepare an Environmental Impact Statement. Section 15 (Estimate Effects of Each Alternative) of the Forest Service Handbook quotes 40 CFR 1508.27 (b)(7), which states: "Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts."

According to the 01/01/2014 to 03/31/2014 Klamath National Forest Schedule of Proposed Action there are 71 active projects: 49 categorically excluded from NEPA, 15 Environmental Assessments, and 7 Environmental Impact Statements. Thus the propensity for this project to have significance due to intensity is likely independent of the presence of Species of Concern which is identified in the NOI as the reason for the decision to move from an Environmental Assessment to an Environmental Impact Statement.

EPA acknowledges the importance of the Crawford Vegetation Management Project goals to improve forest health and decrease fuels. We support the use of prescribed underburning as an important measure necessary to reduce the risk of fire, promote biodiversity, and restore natural ecological processes within the forest. We recognize the ecological significance of the Klamath National Forest, and encourage the inclusion of resource protection measures in the DEIS.

EPA encourages the Forest Service to include in the DEIS the results of a comprehensive biological survey of the Project area. In part to insure work is performed during non sensitive breeding periods for species of concern. Without such a survey, it would be difficult to accurately evaluate the environmental impacts of the proposed action. The DEIS section on environmental impacts should also include evaluations of: water quality, air quality, climate change, and noxious weeds, as well as the impacts of new roads and landings.

We recommend that the DEIS evaluate a range of alternatives, including an alternative which minimizes adverse impacts to water quality, cumulative watershed effects and aquatic resources. We recommend the project design minimize potential adverse environmental effects of the proposed action and maximize a future condition that promotes diversity, a multi-aged heterogeneous forest structure, old growth characteristics, and the ability to adapt to climate change. If a Preferred Alternative is identified in the draft stage of the document, then it should be included in the DEIS, (40 CFR 1502.14(e)).

The DEIS should provide detailed information regarding existing conditions. Of specific interest are current watershed conditions (e.g., cumulative watershed effects), current forest characteristics, and the status of species adapted to late successional habitat (e.g., California spotted owls), fisheries and other sensitive species. We recommend that the DEIS evaluate in detail the potential direct, indirect, and cumulative impacts of the proposed action on all aquatic, riparian, and terrestrial species that are listed as sensitive, threatened, and/or endangered.

We recommend DEIS include a description/inventory of stream crossings such as culverts, bridges and low water crossings that could be impacted by the Project. We recommend that fuel hazard reduction and restoration projects in the Klamath National Forest include systematic monitoring, data collection, and analysis necessary to estimate fine sediment and nutrient load contributions to potentially affected streams. We also recommend the DEIS include a Best Management Plan (BMPs) to reduce water quality impairment.

The Forest Service should determine which aspects of the project comply with EPA's Interim Air Quality Policy on Wildland and Prescribed Fires and are included as part of the applicable EPA approved Smoke Management Program (SMP). All other aspects of the project should be evaluated for general conformity applicability to determine whether a full conformity analysis needs to be conducted. The applicable EPA approved SMPs should be included as part of the DEIS.

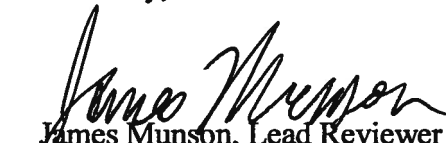
EPA encourages the Forest Service to include in the DEIS the cumulative impacts of climate change on the project, in the light of possible rising temperatures. EPA recognizes that forests in California are already experiencing higher temperatures. We encourage the Forest Service to access the increased vulnerability of each species in the project area from climate change and evaluate the present species propensity for shifting to more suitable range elevations (e.g. suitable habitat, as temperatures change). The findings of such a study should be considered when planning timber harvest and restoration efforts.

Noxious weed species may be present within the project area. The DEIS should include a comprehensive survey of such weeds and possible mitigation measures such as: 1. Cleaning all off-road logging and construction equipment prior to entering the project area to remove dirt, plant parts and material that may carry weed seeds; 2. Include equipment cleaning in the timber sale contract; 3. Require equipment to avoid weed infested areas.

The project design calls for the construction/restoration of approximately 1 mile of roads. The project also calls for 16 new landings which could result in the clear cut of up to 10 acres of trees. The DEIS should include a plan with a list and map of the roads, landings and trails that will be impacted by the project. This plan should include specific information on the extent to which these roads and landings would be recontoured, replanted with appropriate vegetation, monitored, and closed to off-highway vehicle use. We recommend the DEIS include a specific post-harvest schedule for closure of the temporary roads and landings. The DEIS should commit to scarifying the surface of roads, landings, and trails selected for decommissioning to break up compacted soils, seeding such areas with native vegetation, and blocking vehicle traffic with rocks and/or barricades.

We appreciate the opportunity to review this NOI. When the DEIS is released for public review, please send one hard copy and three CDs to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3852 or [munson.james@epa.gov](mailto:munson.james@epa.gov).

Sincerely,

  
James Munson, Lead Reviewer  
Environmental Review Section  
Enforcement Division