



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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REGIONAL
ADMINISTRATOR'S
DIVISION

June 8, 2020

Alice Carlton, Forest Supervisor
Umpqua National Forest
2900 NW Stewart Parkway
Roseburg, Oregon 97471

Dear Ms. Carlton:

The U.S. Environmental Protection Agency has reviewed the US Forest Service's Final Environmental Impact Statement for the proposed Calf Copeland Restoration Project in the Umpqua National Forest, Oregon (EPA Project Number 17-0036-AFS). The EPA comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR §§ 1500-1508), and Section 309 of the Clean Air Act.

According to the Final EIS, the purpose of this proposed project is to provide greater landscape resiliency to wildfire and other disturbances, restore the health and vigor of sugar and ponderosa pine, provide conditions for better protection of life and property within the wildlife-urban interface and restore watershed conditions within the planning area. The project activities would occur on about 3,420 acres of public land. The proposed activities include commercial and non-commercial thinning, completing additional fuel treatments, aquatic restoration and travel management activities. The analysis of impacts from these activities considered three action alternatives and a no action alternative. The primary distinguishing feature among these alternatives is the amount of acreage available for treatments.

The EPA notes that USFS has found that Alternative 3 is the Environmentally Preferred Alternative since it provides the best fire resiliency measures at the wildlife-urban interface, treats the most acres to restore sugar and ponderosa pine health, treats the most acres to accelerate development of late successional habitat, restores oak and meadow habitat and implements the most actions focused on reducing the potential negative impacts to aquatic resources.

The EPA previously provided comments on the Draft EIS in September 2019. We recommended that the USFS include additional information on ensuring compliance with state Water Quality Restoration Plans as they relate to Total Maximum Daily Loads for water quality impaired rivers and streams, additional information about riparian prescriptions, discussions of sensitive, threatened, or endangered species consultations and discussion of whether the local area meets the National Ambient Air Quality Standards, particularly related to smoke management.

The EPA notes that the hydrological analysis in the Final EIS discusses how the activities in the proposed action are designed to maintain or improve riparian reserves, channel morphology and hydrologic flow regimes in alignment with TMDLs. The Final EIS also describes the Memorandum of Understanding that USFS has with the Oregon Department of Environmental Quality which specifically

addresses the management and control of point and nonpoint source water pollution from USFS-managed lands.

The Final EIS illustrates the USFS has taken a more conservative approach with regards to riparian prescriptions analyzed under this project to support the maintenance of ecological processes and functions. The EPA is pleased that resident and anadromous fish bearing streams will have no-commercial-harvest buffers that will meet or exceed the effective shade widths for all alternatives.

The Final EIS states that endangered species consultations with the US Fish and Wildlife Service resulted in a determination that the Service does not anticipate the proposed action will incidentally take listed species. Similarly, National Marine Fisheries Service found that the proposed action would not likely adversely affect certain salmon species and their critical habitat, or any Essential Fish Habitats.

The EPA appreciated the USFS's response to our air quality comments. The Final EIS appropriately describes how all activities associated with this project would be implemented to meet standards in the Clean Air Act and the Regional Haze Rule. The EPA finds that having action alternatives which allow land managers to burn areas when smoke concerns can be mitigated to reduce impacts to smoke sensitive receptors is pragmatic. The EPA recognizes that despite temporary air quality impacts, prescribed burning practices are useful since the Umpqua Forest planning area remains at risk of large fires that would threaten remaining habitat, as evidenced by recent past wildfires.

Thank you for this opportunity to comment. If you have any questions about our comments, please contact Lauren Boldrick of my staff at (907) 271-5097 or boldrick.lauren@epa.gov. You may also contact me at (206) 553-1774 or chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu

Rebecca Chu, Acting Chief
Policy and Environmental Review Branch