Data Submitted (UTC 11): 2/29/2016 8:00:00 AM
First name: Kathleen
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Organization: EPA
Title: Manager Environmental Review Section
Comments: Dear Mr. Myers:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Elk Late-Successional Reserve Enhancement Project, Shasta-Trinity National Forest, California. Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CPR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA recognizes the ecological significance of the Shasta-Trinity National Forest and the importance of improving forest health and sustainability. We support the Forest Service's goals of decreasing fuels and reintroducing fire on the landscape to reduce the risk of catastrophic fire, promote biodiversity, and restore natural ecological processes within the forest.

EPA has rated the DEIS and Preferred Alternative 1 as Lack of Objections (LO; see enclosed "Summary of Rating Definitions"). We support the best management practices and resource protection measures and monitoring included in the project design. The remainder of this letter provides recommendations for your consideration as you prepare the Final EIS.

In the discussion of compliance and consistency with California Assembly Bill32 in Appendix H, the Forest Service states that the project "will have a negligible effect on climate change" because greenhouse gas emissions from the project "would mix readily into the global pool of GHG". EPA recommends avoiding comparisons of a project's GHG emissions to total global or U.S. GHG emissions, as this approach does not provide meaningful information for a project level analysis. Rather, we recommend the Forest Service further consider providing a frame of reference, such as applicable Federal, state, tribal or local goals for GHG emission reductions, and discuss whether the projected emissions levels would be consistent with such goals.

The DEIS includes a brief discussion of climate change, which notes that "trees retained or planted as part of this project will likely compose much of the forests in the project area over the next century" and that "[e]xisting species or genotypes may be poorly adapted to future climate conditions during all or various parts of their life cycles". It states that the reduction of stand density that would result from the proposed treatments "may increase the resilience of the stands to climate change". The Reforestation discussion on page A-33 notes that a mix of species would be selected for planting that would promote
diversity and include non-host trees for specific diseases. It is unclear to what extent resilience to climate change would also be a factor in selecting species for replanting. EPA suggests that the Final EIS include a discussion of the increased vulnerability of certain species under a reasonably anticipated climate change scenario, and any projected shift of forest species to new range elevations that may occur under such a scenario. We recommend that the FEIS disclose any additional climate change adaptation measures that may be appropriate, such as the selection of certain species for replanting of decommissioned roads and landings.

Lastly, we note that the project location may contain areas of potential importance historically, culturally, and/or spiritually to local tribes. We recognize that tribal consultation is an important component of the decision-making process associated with this project, and encourage the Forest Service to continue meaningful consultation, throughout the NEPA process, with all potentially affected tribal governments. We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office be included in the FEIS.

Thank you for the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and

one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Section