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Comments: UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

OFFICE OF ENVIRONMENTAL REVIEW AND ASSESSMENT

1200 Sixth Avenue, Suite 900

Seattle, WA 98101-3140

December 5, 2016

Ian Reid, District Ranger

North Fork John Day Ranger District

PO Box 158

Ukiah, Oregon 97880

Dear Mr. Reid:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Ten Cent Wildfire Protection Project on the North Fork John Day and Whitman Ranger Districts within the Umatilla and Wallowa-Whitman National Forests (EPA Project Number 16-0062-AFS). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The DEIS analyzes the range of effects of four alternatives: the no action alternative and three action alternatives. The action alternatives are designed to (1) create a series of strategically placed defensible fuel profile zones; (2) enhance landscape resilience to future wildfires; and (3) maintain and enhance local communities and economies by providing a diversity of resource management [middot]activities. Project components under Alternative 2 (the preferred alternative) include thinning activities across 13,445 acres, prescribed fire, mechanical fuels treatment, roadside hazard treatments, and provision for private and commercial firewood harvest. In general, Alternative 3 would treat fewer acres with prescribed fire than the proposed alternative, and Alternative 4 would undertake thinning on fewer acres than the other action alternatives.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be robust and well organized. Overall, we find the treatments proposed under Alternative 2 to align well with the broad body of science on dry and moist mixed conifer forests (http://www.fs.fed.us/pnw/publications/MMC Synthesis_ 24Feb 14.pdf). We also appreciate the decision to limit activity within the Riparian Habitat Conservation Areas. We have reviewed the Project Design Criteria in Chapter 2 and the Best Management Practices referenced in Appendix B and find the proposed project activities are consistent with the 2010 John Day River Basin Total Maximum Daily Load and Water Quality Management Plan.

In our August, 2015 scoping comments, the EPA recommended that the Forest undertake an analysis of greenhouse gas emissions consistent with CEQ guidance (https://www.whitehouse.gov/administration/ eop/

ceg/initiatives/nepa/ ghg-guidance). The DEIS states on page 221 that, "A project of this size would have such minimal contributions of greenhouse gasses that.[hellip] the proposed action's direct and indirect contribution to greenhouse gasses and climate change would be negligible. Because the direct and indirect effects would be negligible, the proposed action's contribution to cumulative effects on greenhouse gasses and climate change would also be negligible." We recommend that as the EIS is finalized, the Forest Service move away from characterizing project-related emissions as not being meaningful. Changes in climate are not attributable to any single action, but are exacerbated by a series of smaller decisions.

As the FEIS is finalized, we encourage the Forest Service to include a comparison of net GHG emissions and carbon stock changes that would occur with and without implementation of the Ten Cent Project. This analysis can incorporate by reference earlier programmatic studies or information, such as management plans, inventories, assessments, and research that considers potential changes in carbon stocks, as well as any relevant programmatic NEPA reviews.

Based on our review, we are rating the DEIS as LO. (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this project. If you have any questions about our review, please contact me at (206) 553- 1601, or by electronic mail at littleton.christine@epa.gov. Or you may contact Teresa Kubo of my staff at 503-326- 2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,

Christine B. Littleton, Manager

Environmental Review and Sediment Management Unit

Enclosure: 1. US Environmental Protection Agency Rating System for Draft Environmental Impact Statements

US Environmental Protection Agency Rating System for Draft Environmental Impact Statements[mdash]Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - Lack of Objections

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action* Environmental Impact of the Action The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - Environmental Concerns EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - Environmental Objections EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project. Alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - Environmentally Unsatisfactory EPA review has identified adverse environmental impacts that are of

sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -Adequate EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - Insufficient Information The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - Inadequate EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.