



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

November 3, 2006

James M. Peña
Plumas National Forest
159 Lawrence Street
P.O. Box 11500
Quincy, CA 95971-6025

Subject: Final Environmental Impact Statement (FEIS) for the Freeman Project (CEQ# 20060403)

Dear Mr. Peña:

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.

This project is under the direction of the Herger-Feinstein Quincy Library Group Act (HFQLG Act) and the 2004 Sierra Nevada Forest Plan Amendment (SNFPA) supplemental EIS and Record of Decision (ROD). The Freeman Project area is located in Plumas County, California, and covers approximately 14,967 acres. The Final Environmental Impact Statement (FEIS) analyzes the proposal to treat 3,066 acres of hazardous fuels in the Freeman Project Area through thinning, creation of Group Selection openings, and removal of conifers. Transportation system improvements are also planned as part of the proposed project.

During the scoping period for an Environmental Assessment (EA) for this project, concerns were expressed regarding the proposed aspen treatments, northern goshawk avoidance, and the size of trees to be removed. As a result, the Forest Service decided to complete a full Environmental Impact Statement (EIS). EPA appreciates the effort to address public concerns and commends the Forest Service for making this decision. Four alternatives were considered in the EIS including: Alternative 1 (Proposed Action); Alternative 2 (No-action); Alternative 3 (Environmentally Preferable Alternative); and Alternative 4 (Preferred Alternative). EPA rated the Draft EIS as Environmental concerns (EC-2) and recommended selection of Alternative 3 (Environmentally Preferable Alternative) as the proposed alternative. The selection of Alternative 3 would result in fewer impacts to habitat areas, species of concern, soil resources, and watersheds. EPA also expressed concern about air impacts from equipment used for mechanical thinning.

The Forest Service has decided to implement Alternative 4 (with modifications); the ROD was signed on September 13, 2006. EPA recognizes that Alternative 4 will result in fewer impacts to habitat areas and a reduced amount of soil and water degradation than the alternative proposed during scoping (Alternative 1); however, impacts will be more substantial than with the environmentally preferable alternative (Alternative 3). The Forest Service identifies Alternative 4 as being more economically feasible than Alternative 3 within the ROD.

EPA continues to express concern about the selection of Alternative 4. The implementation of Alternative 4 will result in one watershed (26 % of the project area) approaching a threshold of concern, which will result in greater Cumulative Watershed Effects (CWE). Alternative 3 would have further protected sensitive habitat for the California spotted owl, northern goshawk, and the great gray owl; maintained more habitat for neotropical migratory birds; and lessened direct impacts to use areas for the bald eagle. EPA promotes the concept of protecting habitat for sensitive species before they become listed as threatened or endangered. EPA remains concerned that the Forest Service did not quantify emissions from equipment used for mechanical thinning.

We appreciate the opportunity to review the FEIS. We have received the ROD, which was signed on September 13, 2006. If you have any questions, please contact me at (415) 972-3843 or Ann McPherson, the lead reviewer for this project. Ann can be reached at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,

/s/ Nova Blazej for

Enrique Manzanilla, Director
Communities and Ecosystems Division