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Organization: UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Title: Chief, Policy and Environmental Review Branch

Comments:

Dear Ms. Bishop:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed Huckleberry Restoration Project on the Payette National Forest, Council Ranger District in Adams County, Idaho (EPA Project Number 19-0036-AFS; CEQ Number 20190133). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The purpose of the Huckleberry Restoration project is to create a more resilient forest ecosystem with an emphasis on: habitat improvements for specific wildlife species of concern, maintaining and promoting large tree forest structure and early seral species composition, reducing the risk of uncharacteristic wildland fire, and promoting resiliency to insects and disease. The project is part of the Collaborative Forest Landscape Restoration Program and the Forest Service solicited recommendations for the proposed action from the local collaborative, the Payette Forest Coalition.

The DEIS analyzes the Proposed Action, Alternative 2, which includes noncommercial thinning on 35,800 acres, commercial treatment on 17,700 acres, regeneration harvest on 3,470 acres and prescribed fire throughout the project area. In addition, proposed road activities would involve 167.8 miles of road decommissioning, 62.3 miles of long-term closure of roads, and 30.8 miles of road improvement or realignment. The DEIS also analyzes the No Action Alternative and Alternative 3, which differs from the proposed action by increasing the amount of regeneration harvest to 5,790 acres and retains fewer legacy trees.

The EPA is supportive of the overarching goals and objectives of the proposed action, 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 need to manage stands to obtain a more sustainable, resilient forest that promotes habitat for species listed as threatened or endangered under the Endangered Species Act specifically the northern Idaho ground squirrel and species dependent on dry forest types ( e.g., white-headed woodpecker). We also commend the Forest Service for the ongoing collaboration with the Payette Forest Coalition.

We acknowledge the need to manage forests on a landscape scale to accomplish restoration goals holistically. The scale of the project area (67,000 acres) and proposed treatments encompasses large areas; however, the timeframe for accomplishing the extensive treatments is unclear. The DEIS discusses that proposals to be implemented with CFLR Program funds must not exceed 10 fiscal years. The DEIS also states that prescribed fire treatments would occur over the next 20 years. It is unclear whether vegetation and/or road treatments would occur over the next 10 years while prescribed fuel treatments could be applied over a different timeframe. For clarity, we recommend that the Final EIS include information regarding the time period for the life of the project and the priority/anticipated timing of various treatments that would be accomplished throughout that period.

Effective October 22, 2018, the EPA suspended the inclusion of ratings in our comment letters. Information about this change and the EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: [https://www.epa.gov/nepa/environmental-impact\[shy\]statement-ratingsystem-criteria](https://www.epa.gov/nepa/environmental-impact[shy]statement-ratingsystem-criteria). We appreciate the opportunity to review and comment on the DEIS. If you have any questions about our review, please contact Lynne Hood of my staff at (208) 378-5757 or via email at [hood.lynne@epa.gov](mailto:hood.lynne@epa.gov), or you may contact me at (206) 553-1841 or by email at [nogi.jill@epa.gov](mailto:nogi.jill@epa.gov).

Sincerely,

Jill A. Nogi, Chief

Policy and Environmental Review Branch