UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 15th 2010

Kathleen Morse, Forest Supervisor
Lassen National Forest
2551 Riverside Drive
Susanville, CA 96130

Subject: Final Environmental Impact Statement for Lassen National Forest Motorized Travel Management, Butte, Lassen Modoc, Plumas, Shasta, Siskiyou and Tehama Counties, CA (CEQ# 20090433)

Dear Ms. Morse:

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 our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Lassen National Forest on July 29, 2009. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) because of concerns regarding the cumulative effects of the project.

EPA commends the Forest Service for their efforts to address the many challenges inherent in developing a balanced Motorized Travel Management Plan that also responds to recreational and resource management demands. We acknowledge that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses.

We appreciate the efforts of the Forest Service and its consultants to respond to our comments on the DEIS in Alternative 11 of the FEIS. However we note that the Final Environmental Impact Statement (FEIS) presents fourteen alternatives and includes a new preferred alternative (Modified Alternative 5).

EPA recognizes that route designations are only part of what is needed to reduce the ongoing adverse impacts to natural resources from the National Forest Transportation System. We continue to believe that a holistic approach to travel management planning, whereby route designations are guided by travel analysis, known locations of resource impairment, and prior determination of the minimum road system needed, (36 CFR Subpart A 212.5 (b)(2); would best serve the long-term interest of the public, Forest Service, and National Forest resources.

The EPA continues to have concerns with the Forest Service position that roads with lower maintenance levels will result in less use and therefore less erosion and sediment affecting water resources. We recommend that the ROD take into consideration the nature of use on Maintenance Level 2 roads and off-highway vehicles, (OHVs) increased potential effect on sedimentation rates. We believe this is particularly important, considering that the preferred plan almost doubles the deferred maintenance while "90% of the Lassen National Forest's existing culverts are plugged with sediment causing fish barriers", (Michael Derrig, U.S. Forest Service, Lassen National Forest, http://www.fsl.orst.edu/geowater/PEP/calfed/.

Achieving a balance between public access and the protection of sensitive resources is a challenge. To continue a high level of access while ensuring sensitive habitats are protected, we continue to recommend eliminating routes in sensitive and easily damaged high elevation habitat and focusing initial monitoring, enforcement, public education and volunteerism on areas of known adverse resource impacts. We recommend the Forest Service commit to this approach in the Record of Decision.

We appreciate the opportunity to review this FEIS. Please send one hard copy of the final Record of Decision to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or munson.james@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

cc:
Steve Thompson, California Operations, US Fish and Wildlife Service
Angela Wilson, Central Valley Regional Water Quality Control Board
Lahontan Regional Water Quality Control Board
Northern Sierra Air Quality Management District