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

4/26/2010

David Loomis, Project Manager
Bridgeport Ranger District
Humbolt-Toiyabe National Forest
1536 S. Carson Street
Carson City, NV 89701

Subject: Final Environmental Impact Statement for Bridgeport Travel Management Project, Lyon, Douglas, and Mineral Counties NV and Mono County CA (CEQ# 20100087)

Dear Mr. Loomis:

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 EIS (DEIS) and provided comments to the Forest Service in our letter of September 14, 2009. We rated it Environmental Concerns - Insufficient Information (EC-2) due to concerns regarding the scope of the alternatives analysis, water resources, wet weather and seasonal closures, erosion, decommissioning of unauthorized routes, monitoring and enforcement, climate change, and full disclosure and procedural comments.

We appreciate the additional discussion of climate change added to the FEIS. The Forest Service's response addressed our concern that the proposed action does represent the minimum road network. Our comment letter expressed our preference for expansion of the scope of the Travel Management Project to include current roads and trails with known impacts. We now understand that the need for current roads and trails was considered in the Travel Analysis Process, which the Forest Service has determined is not subject to NEPA, but did include public involvement.

We remain concerned that the FEIS did not include route-by-route information on erosion potential. Your response stated that "[t]he FEIS clarifies the erosion potential of both unauthorized routes and in the 85-acre area." The only information we could find to support this was the use of route density as an indicator of erosion potential (page 64) and the information we mentioned in our original comment at Appendix B. Route density, by its nature, is not route specific. And, as we noted in our comments, the information in Appendix B lists erosion potential for various soil types without including a map of soil types or listing of soil types for each route.

The FEIS added additional discussion of monitoring and enforcement of designated routes. While we would have preferred the FEIS include even more specific information on monitoring and enforcing its rules over such a large area with limited resources, we do want to compliment an element of the Forest Service's approach. For some routes and trails (Route DP026, Trail 32226 and Trail 32115), the Forest Service will monitor annually to determine if vehicles are traveling off the trail (page 16). If so, the Forest Service will erect barriers, educate users, and enforce its rules. If the off trail use still continues, the Forest Service may close these routes to motorized vehicles. EPA supports this approach to encourage responsible use and possibly enlist the support of responsible Off-Highway Vehicle users in limiting inappropriate off-trail use; however, we suggest more frequent monitoring, e.g. quarterly, particularly as the initial restrictions are enacted.

We appreciate the opportunity to review the FEIS, and would be pleased to discuss our comments with you. If you have any questions, please contact Tom Kelly, the lead reviewer for this project, at 415-972-3856 or kelly.thomasp@epa.gov, or me at (415) 972-3521.

Sincerely,

Connell Dennis

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