



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

April 28, 2014

Kate Klein, Forest Supervisor
c/o Dede Steele, Project Leader
Ochoco National Forest
3160 NE 3rd Street
Prineville, Oregon 97754

Re: U.S. Environmental Protection Agency comments for the Ochoco Summit Trail System Project Final Environmental Impact Statement. Project Number: 09-067-AFS.

Dear Ms. Klein:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We continue to support the project's purposes of designating a sustainable system of roads, trails and areas open to motor vehicles that will provide legal public access; enhance regulation of unmanaged wheeled motor vehicle travel; protect resources; and decrease conflicts between motorized and non-motorized use on the Ochoco National Forest. However, we also continue to believe that new trails and increased use has the potential to increase sedimentation to streams, increase the introduction and spread of invasive plants, and impact wildlife and wildlife habitat.

To address our concerns regarding unavoidable adverse impacts, we recommended the Forest Service consider off-setting the impacts of new trail, new disturbance or increased use within sensitive areas with decommissioning of user-created trails in our March 25, 2013, comments on the Draft EIS. The Forest Service's response details many of the efforts and measures taken to minimize effects. We appreciate these efforts, including modifications to reduce effects at specific locations with hydrologic concerns. We also appreciate that physical closure on unwanted and unauthorized routes is consistent with off-setting the development of new designated trails.

To further reduce potential adverse environmental effects, we recommend that the Forest Service consider, for example, including the following associated actions in the final Record of Decision:

- off-setting new impacts through the decommissioning of an amount of unwanted, user-created or closed routes (miles currently impacting sensitive resources, failed or problematic stream crossings, confusing intersections) commensurate with proposed routes (new trail, new stream crossings, new intersections, or increased use)
- a decision threshold (special events, heavy use, busy weekends) for installing off-highway vehicle wash stations to reduce the risk of spreading invasive species.

Thank you for this opportunity to continue our work with the Forest Service on travel management planning. If you have any questions please contact me at (206) 553-1601, or by electronic mail at

reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382, or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine B. Reichgott". The signature is fluid and cursive, with a large initial "C" and "R".

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit