



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

February 22, 2010

Mr. Scott Conroy  
Rogue River-Siskiyou National Forest  
Supervisor's Office  
3040 Biddle Road  
Medford, Oregon 97504

**RE: U.S. Environmental Protection Agency (EPA) review and comments on the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for Motorized Vehicle Use on the Rogue River-Siskiyou National Forest (Forest) EPA Region 10 Project Number: 08-053-AFS**

Dear Mr. Conroy:

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

We appreciate the level of responsiveness you and your staff provided. Many of the Forest's responses to comments resulted in environmentally protective elements for the selected alternative, Alternative 5, relative to the Proposed Action. To protect watershed resources you decided not to convert Road 3313110 to a motorized trail. To protect Inventoried Roadless Area values – among other considerations - you decided against converting Road 4402494 in the Biscuit Hill area to a motorized trail. To increase the effectiveness of implementing the designated system – and ensure that predicted environmental benefits are achieved - the ROD lists your desire to develop a public education strategy. We believe these decisions increase the environmental benefits likely to result from your overall efforts to comply with the Travel Management Rule.

Our primary remaining concern is risk to human health that could result from exposure to Naturally Occurring Asbestos (NOA). More detailed discussion is provided below along with recommendations to address NOA and other aspects of the project that we believe would help increase its potential long term environmental and social benefits.

**Naturally Occurring Asbestos (NOA)**

We appreciate the FEIS's additional analysis of potential exposure risk to NOA, but we remain concerned that the ROD does not include a mitigation measure to address this risk. We concur with the FEIS's main conclusion, "The risk of disease depends upon the intensity and duration of exposure to asbestos." (p. III-65). It follows that reducing exposure will reduce the risk of developing asbestos related cancers and debilitating and potentially fatal non-cancer

disease.<sup>1</sup> In the absence of a more robust analysis of the precise risks faced by Forest users we believe NOA related mitigation measures are warranted.

The FEIS includes some potential mitigation measures but they are not adequately developed. On page III-68 the FEIS states that, "...risk can be reduced by actions individuals take to reduce exposure to NOA." A series of information sources is then listed but we do not believe this list in the FEIS will help Forest users take action. In your response to comments you suggest that the Forest has reviewed and is considering adopting the Forest Service Region 5's management protocols regarding the potential for NOA (A-48). There is no mention of these protocols – or any NOA related mitigation measure – in the ROD.

We recommend the Forest develop and implement a plan to address risk from NOA. EPA believes an effective plan would include: (i) support for additional research to more precisely define risk from NOA on the Forest, and, (ii) the integration of NOA information into the Forest's public education strategy. Specific recommendations for the public education strategy include: (i) publish a factsheet modeled after or serving a similar purpose to the Pacific Southwest Region's, "Naturally Occurring Asbestos What Visitors to National Forests Need to Know"<sup>2</sup>, and, (ii) include the posting of warning signs about asbestos hazards in a sign plan. As more information regarding specific risk from exposure to NOA on the Forest becomes available designation revisions based on this information may be warranted and should be considered in future Motor Vehicle Use Map updates.

#### **Adaptive Management and the Minimum System**

In our May 1, 2009 comments on the DEIS we recommended that the FEIS include more information on your implementation and adaptive management plan. Your changes to the section "Monitoring Common to Action Alternatives" was responsive to our comment. We especially appreciate that these changes were carried through to the ROD and include monitoring with the objective of minimizing, "... (1) damage to soil, watershed, vegetation, and other forest resources; (2) harassment of wildlife and significant disruption of wildlife habitats;..." (p. 7). Minimizing these potential adverse impacts from motorized vehicle use may indeed, as is suggested in the FEIS and ROD, require the revision of designations.

EPA supports basing these revisions on travel analysis. We therefore support your commitment in the ROD to making revisions in accordance with Forest Service Manual (FSM) Travel Management and Travel Planning documents - FSM 7712, 7715 and 7716. FSM 7712 references the Travel Analysis chapter of the Forest Service Handbook (FSH) – FSH 7709.55, Chapter 20. We mention FSH 7709.55 because we support future travel management decisions which are informed by and incorporate by reference documentation similar to that described in section 21.6 of FSM 7709.55 (E.g., "Document travel analysis in a report including: 1. A map and prioritized list of the risks and benefits associated with changing the part of the forest transportation system under analysis, and a map and prioritized list of opportunities for addressing those risks;...").

---

<sup>1</sup> <http://www.epa.gov/region09/toxic/noa/clearcreek/pdf/CCMA-exposure-risk-assessment-factsheet.pdf>

<sup>2</sup> <http://www.fs.fed.us/r5/noa/pdfs/NOAVisitorInformationPaper.pdf>

We value your ongoing work to address road related environmental issues and commend you for your efforts, including a recent decision to close, decommission and storm proof roads in the Applegate River – McKee Bridge Legacy Roads project.

**The Boundary Trail**

Your decision to designate the Boundary Trail as a motorized trail increases the risk of adverse impacts to the Botanical Area, Backcountry Non-Motorized areas and Research Natural Areas through which it travels. To minimize this risk we recommend the Forest give emphasis to compliance and monitoring for the Boundary Trail. We also recommend that the Forest develop a decision tree with the potential environmental and social impacts which would trigger a revised designation.

We commend you for your efforts to balance competing interests and thank you for this opportunity to comment. Please contact Erik Peterson of my staff at (206) 553-6382 or by email at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov) with any questions or concerns regarding this review.

Sincerely,



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