



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

MAR 15 2016

David Hays, Forest Supervisor
Lassen National Forest
2550 Riverside Drive,
Susanville, CA 96130
Attention: Chris O'Brien, Ecosystems Staff Officer

Subject: Draft Environmental Impact Statement for the Lassen National Forest Over-Snow Vehicle Use Designation Project, Lassen National Forest. (CEQ# 20160020)

Dear Mr. Hays:

The U.S. Environmental Protection Agency has reviewed the DEIS for the Lassen National Forest Over-Snow Vehicle Use Designation Project, Lassen National Forest pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA recognizes the many challenges inherent in developing a balanced Over-Snow Vehicle Use Plan that responds to both recreational and resource management demand. We appreciate the Forest Service's efforts to reduce impacts on Lassen National Forest resources from over-snow vehicle use.

EPA has rated the DEIS and all action Alternatives as Lack of Objections (LO; see enclosed "Summary of Rating Definitions"). We support the use of best management practices such as those incorporated into the water quality management and monitoring components of the project design. The remainder of this letter provides recommendations for your consideration as you prepare the Final EIS.

The DEIS assumes that "Global climate change is expected to substantially affect California over the next 50 years." We understand that the DEIS prohibits OSV use in any area below 3,500 feet in elevation on the Lassen National Forest to ensure adequate amount of snowfall for OSV use. We support this measure and recommend that the FEIS include a clear provision to adjust this elevation prohibition, as needed, to accommodate the possibility that climate change will alter the minimum elevation at which snowfall occurs, in order to ensure that OSV activities are directed to areas with sufficient snow cover for responsible use into the foreseeable future. Page 362 of the DEIS suggests that the season for OSV use may need to be shortened to avoid impacts to soil and water quality from OSV contact with sub-snow dirt. We recommend that the FEIS include a commitment to appropriate monitoring to ensure the Forest is implementing the most appropriate season of use for OSV.

EPA also recommends that the FEIS evaluate air quality impacts from construction equipment, such as snowcats and other tracked vehicles, and identify mitigation measures that would reduce such impacts. Specifically, EPA recommends that, where possible, the Forest Service ensure that construction vehicles use the cleanest burning, highest tier engines practicable or mandate the installation of diesel particulate filters on older construction equipment. Other mitigation opportunities to further reduce emissions

include limiting truck and heavy equipment idling to no more than 5 minutes and limiting vehicle speeds to 15 mph or less wherever practicable.

Lastly, we note that the project location may contain areas of historical, cultural, and/or spiritual importance to local tribes. We encourage the Forest Service to continue meaningful consultation with all potentially affected tribal governments throughout the NEPA process. We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office be included in the FEIS.

Thank you for the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

