



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

OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

December 2, 2016

Marcy Anderson
Ochoco Summit Trail System ID Team
3160 NE 3rd Street
Prineville, Oregon 97754

Dear Ms. Anderson:

We have reviewed the Ochoco National Forest's September 2016 Supplemental Final Environmental Impact Statement and Draft Record of Decision for the Ochoco Summit Trail System (EPA Region 10 Project Number: 09-067-AFS). Our review was conducted in accordance with the EPA's responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We commend the Ochoco National Forest for your substantial efforts toward effective public involvement and utilization of the NEPA process to reduce adverse environmental impacts. In terms of public involvement, we note the Forest's specific written responses to the 1,090 separate comment communications¹ and the 19 presentations, field trips and project updates conducted in 2014.² The Forest's written responses to comments are substantive and reflect a commitment to meaningful public involvement. In terms of using the NEPA process to reduce impacts, we note that Alternative 5 - which was developed for the Supplemental DEIS and is now the Selected Alternative in the Draft ROD - "...has the least number of site specific concerns..."³. Reducing site specific concerns is one way the Forest has used this NEPA process to design a Selected Alternative that, relative to other action alternatives, "...goes the farthest in providing more effective protection of water quality and aquatic resources."⁴

In our April 2016 comments on the Supplemental Draft EIS we noted our support for the project's purposes, described how the 2014 Final EIS was responsive to the EPA input, and stated that we have continuing concerns about the potential for new trails and increased motorized use to increase sedimentation to streams, increase the introduction and spread of invasive plants, and impact wildlife and wildlife habitat. We also recommended that the SFEIS include additional rehabilitation and restoration sites for user created routes and decommissioned roads that have the potential to cause resource damage and are no longer needed. Rehabilitation of unauthorized routes is important because the SFEIS and Draft ROD depend on rehabilitation to offset the adverse effects of route creation.

While we appreciate that Alternative 5 proposes rehabilitation and concealment at 25 sites on user-created routes, 39 sites on decommissioned roads and 121 sites on closed roads,⁵ we are aware that these

¹ SFEIS, Appendix A

² Draft ROD, p. 19

³ SFEIS, p. 238

⁴ Draft ROD, p. 19

⁵ SFEIS, p. 303

actions are not funded as part of this decision. However, if this project is implemented, these actions will be eligible for new funding opportunities due to their being located in a designated Off Highway Vehicle Management Area. In order to show commitment and help increase the likelihood of funding for needed rehabilitation and restoration, we suggest that the Final ROD include additional information that communicates the Forest's capacity and intended amount of effort for preparation and submittal of funding applications. Consider, for example, disclosing in the Final ROD known potential funding sources, and the number of staff, amount of time, or funding application goals that the Forest plans to apply toward securing necessary funding for proposed rehabilitation and restoration projects.

Thank you for the opportunity to comment on this Supplemental Final EIS. If you have any questions, please contact me at (206) 553-1601 or by electronic mail at littleton.christine@epa.gov or contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,



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