



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

March 1, 2010

Patricia A. Grantham, Forest Supervisor
Klamath National Forest
1312 Fairlane Road
Yreka, CA. 96097-9549
Attn: Travel Management

Subject: Final Environmental Impact Statement for Klamath National Forest
Motorized Travel Management, Siskiyou County, CA and Jackson
County, OR (CEQ# 20100023)

Dear Ms. Grantham:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the above-referenced project. Our review and comments are 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 Environmental Impact Statement (DEIS) for Klamath National Forest Motorized Travel Management and provided comments to the Forest Service on July 29, 2009. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding the scope of the travel management planning process, season of use, potential effects on water resources, and naturally occurring asbestos. We advised that additional information was needed to fully describe monitoring, enforcement commitments, effects of climate change, and future planning for specific designated routes.

EPA commends the Forest Service for its efforts to address the many challenges inherent in developing a balanced Public Motorized Travel Management Plan that responds to recreational and resource management demands. We acknowledge that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses. The permanent prohibition of cross country travel off designated routes and the switch from unmanaged to managed motorized recreational use will result in significant environmental benefits.

We appreciate the efforts of the Forest Service and its consultants to respond to our comments on the DEIS. The FEIS describes and adequately addresses EPA's issues concerning asbestos and mitigation. EPA is particularly pleased that Forest Service has included mitigation measures in order to reduce or eliminate erosion, including treatment of stream crossings in the impaired Humbug Creek watershed. We continue to recommend maintenance in all impaired

watersheds, especially riparian reserves, in order to comply with Total Maximum Daily Load (TMDL) requirements. The California Klamath River TMDLs for temperature, dissolved oxygen, and nutrients are currently out for public review and are scheduled to be approved in December 2010. EPA suggests utilizing these TMDLs in the final planning of this project to ensure the preferred alternative contributes to, and does not hinder, attainment of pollutant load reductions required by the approved TMDLs.

We continue to support a thorough evaluation of the water quality effects of the change of 130 miles of roads from “highway-only” to “mixed use” and the associated reduced maintenance level in the preferred alternative. EPA acknowledges that this action may better align road maintenance requirements with available funds and resources; however, roads and trails are primary contributors of excess sediment and water quality contaminants, many as a result of limited maintenance. We are concerned with the potential adverse water quality effects of a reduction of maintenance on roads where existing use may already be adversely affecting resources

Route designations are only part of what is needed to reduce the ongoing adverse impacts to water quality and other resources from the National Forest Transportation System (NFTS). EPA had hoped the Forest Service would take this opportunity to review and rationalize the NFTS, pursuant to Travel Management Rule direction, to identify the minimum road system needed (36 CFR Part 212 Subpart A); to address known road-related resource impairments and use conflicts of both the existing NFTS and unauthorized user-created system; and to align the transportation system with maintenance and enforcement capabilities. We continue to believe that such a holistic approach to travel management planning would better serve the long-term interests of the public, Forest Service, and National Forest resources, and we recommend the Forest Service implement Subpart A as soon as possible.

We appreciate the opportunity to review this FEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

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

cc: Steve Thompson, California Operations, US Fish and Wildlife Service

David Leland, Watershed Protection Division, North Coast Regional Water
Quality Control Board (RB1)

Gary Stacey, Regional Manager, Northern Region, California Department of Fish
and Game