



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

March 18, 2010

Tyrone Kelley  
Forest Supervisor  
Six Rivers National Forest  
1330 Bayshore Way  
Eureka, CA 95501  
Attn: Travel Management

Subject: Final Environmental Impact Statement for Lower Trinity and Mad River  
Motorized Travel Management, Humboldt and Trinity Counties, CA (CEQ#  
20100044)

Dear Mr. Kelley:

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 Lower Trinity and Mad River Motorized Travel Management and provided comments to the Forest Service on August 3, 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, and potential effects on water resources. 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. EPA continues to recommend elimination of routes with existing resource impairments that are located in watersheds with a high risk of impaired water quality. EPA is pleased that Forest Service has included mitigation measures to lessen the impacts to

water resources, and we commend the Forest Service for ensuring that mitigation measures will be completed prior to use by the public (pg. 3.5-98).

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](mailto:skophammer.stephanie@epa.gov).

Sincerely,

/s/

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

cc: David Leland, Watershed Protection Division, North Coast Regional Water  
Quality Control Board (RB1)  
Ray Bosch, United States Fish and Wildlife Service