



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

January 22, 2010

Stanley G. Sylva
Forest Supervisor
Modoc National Forest
Attn: Travel Management Team
800 West 12th Street
Alturas, CA 96101

Subject: Final Environmental Impact Statement for Modoc National Forest
Motorized Travel Management Plan, Modoc, Lassen, and Siskiyou
Counties, CA (CEQ# 20090406)

Dear Mr. Sylva:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document 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 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, seasonal restrictions, and the change to managed motorized recreational use will result in significant environmental benefits.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for Modoc National Forest Motorized Travel Management and provided comments to the Forest Service on February 11, 2009. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns regarding the scope of the travel management planning process and the continued use of roads and trails near fens, wet meadows, riparian habitat, and vernal pools. We also advised that supplementary information was necessary to describe the affected environment and enforcement commitments.

We appreciate the efforts of the Forest Service and its consultants to respond to our comments on the DEIS. We note that the Record of Decision (ROD) results in the removal of routes with the potential to affect Sensitive and Watch List plant species. Additionally, we recognize that the FEIS describes and addresses EPA's issues concerning wildlife movement and

habitat fragmentation, and that the Forest Service included a discussion of climate change impacts.

EPA continues to recommend that the Forest Service identify and describe mitigation measures that will be implemented prior to approved public motorized use, particularly for routes near vernal pools and wet meadows. The ROD should include a commitment to implement such measures. Many of the proposed designated routes were un-planned and initially developed without proper environmental analyses, and may require improvements to avoid and minimize environmental impacts before their availability for use.

EPA had hoped the Forest Service would take this opportunity to review and rationalize the National Forest Transportation System (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 recommend the Forest Service implement Subpart A as soon as possible. At a minimum, the Travel Management Plan decision documentation should include information on the minimum Forest road system needed and actions that will be taken to comply with Subpart A.

Route designations are only part of what is needed to reduce the ongoing adverse impacts to water quality and other resources from the NFTS. We continue to believe a more holistic approach to travel management planning, whereby route designations are guided by travel analysis, known locations of resource impairment, and prior determination of the minimum road system needed, would better serve the long-term interests of the public, Forest Service, and National Forest resources.

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

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