



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

May 17<sup>th</sup> 2010

Jim Beard  
Coconino National Forest  
CNF Travel Comments  
P.O. Box 1919  
Sacramento, CA 95812

Subject: Draft Environmental Impact Statement for Travel Management on Coconino National Forest,  
Coconino, Yavapai Counties, Arizona (CEQ# 20100081)

Dear Mr. Beard:

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 provided scoping comments to the Coconino National Forest (CNF) on September 11, 2007. We commend the Forest Service for its efforts to address the many challenges inherent in developing a balanced Travel Management Plan that responds to both recreational and resource management demands. EPA applauds the CNF's proposal to reduce roads via a determination of the minimum road system needed, pursuant to 36 CFR Subpart A 212.5 (b)(2). We acknowledge that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses.

Based on our review, we have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"), due to our concerns that adverse impacts to the environment may result from the lack of funds for maintenance, monitoring, and enforcement. We are also concerned about the lack of detail provided in the DEIS.

We appreciate the opportunity to review this DEIS. Please send one hard copy of the FEIS and one CD to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or [munson.james@epa.gov](mailto:munson.james@epa.gov).

Sincerely,  
/s/

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

Cc: Shaula Hedwall, Fish and Wildlife Conservation Office, USFWS

**EPA's Detailed Comments on the Draft Environmental Impact Statement for Travel Management on Coconino National Forest, Coconino, Yavapai Counties, Arizona (CEQ# 20100081), May 17, 2010**

**Range of Alternatives.**

While we agree Modified Alternative 3 is environmentally superior to the other remaining alternatives, we recommend the Coconino National Forest (CNF) amend that proposed alternative to further reduce adverse impacts to critical habitat and riparian resources. EPA suggests the CNF include in the Final Environmental Impact Statement (FEIS) a specific plan for prioritizing deferred maintenance to minimize any potential adverse effects to the environment. The FEIS should evaluate strategies to increase funding to support the viability of Modified Alternative 3.

**Decommissioning/Follow-up Actions.**

The FEIS should commit to specific follow-up actions, such as an inventory of stream crossings, inspection of routes identified as being in poor condition, and restoration and decommissioning of closed routes. The FEIS should consider the likelihood of adverse effects to biodiversity, such as habitat loss and fragmentation, as a result of not decommissioning roads. EPA encourages the CNF to evaluate the initial cost of defragmentation versus the cost of repairing a dilapidated forest adjacent to abandoned road systems in the long term. In addition to gates or barriers at road entrances, EPA suggests the CNF restore the roads' original geomorphic and geologic topography, as well as re-plant appropriate native vegetation to accelerate the process of returning the roads to nature. The CNF should consider the number of stream crossings in need of restoration when prioritizing roads for decommissioning.

**Monitoring and Enforcement.**

We recommend the FEIS demonstrate that the proposed monitoring and enforcement strategy is adequate to ensure that motorized vehicle use will not violate access restrictions nor exacerbate already identified road-related resource problems. Such a strategy should include specific information on the monitoring and enforcement program priorities and focus areas (e.g., issues, specific locations), personnel needs, costs, and funding sources. We recommend the monitoring and enforcement strategy be periodically updated (e.g., annually or biennially). We recommend the CNF consider using volunteers to assist in monitoring and decommissioning efforts. One possible resource for identifying appropriate volunteer program is the National Directory of Volunteer Environmental Monitoring Programs, <http://www.epa.gov/owow/monitoring/dir.html>.

**Climate Change.**

We recommend that the FEIS include a description of climate change and its implications for the National Forest System roads. For example, describe and evaluate projected climate change consequences, such as increased frequency of high intensity storms, amplified rain events, and their potential effects on culverts, bridges, and low water crossings. We recommend that the FEIS clearly describe the effects of the project on water quality, riparian habitat, fish passage and other sensitive species in the context of climate change.

### **Direct, Indirect, and Cumulative Effects.**

NEPA requires evaluation of direct, indirect, and cumulative effects that are caused by the action (40 CFR 1508.8(b) and 1508.7). Of specific interest are potential cumulative effects of the proposed project and livestock grazing, forest thinning, private land development, and miscellaneous recreational uses that may negatively affect water and soil resources in the area if left unmitigated. In order to avoid impacts from erosion, the Forest Service should provide commitments in the FEIS/ROD which include provisions for water management plans and erosion plans that will be implemented and enforced.

### **Air Quality.**

The FEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). Such an evaluation is necessary to ensure compliance with State and Federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality.

The FEIS should describe and estimate air emissions from the proposed road work, including potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. The FEIS should specify the emission sources, by pollutant, from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention. The FEIS should identify the need for an Equipment Emissions Mitigation Plan (EEMP). An EEMP would identify actions to reduce diesel particulate matter, carbon monoxide, hydrocarbons, and NOx associated with construction activities.

### **Species of Concern.**

EPA recommends that the FEIS include a complete review of species that would be affected by the project alternatives. The results of consultation with the United States Fish and Wildlife Service, if appropriate, regarding threatened or endangered species or critical habitat should be included in the FEIS. We encourage the Forest Service to relocate, reduce, or eliminate portions of camping corridors that adversely affect threatened, endangered, or candidate species or their potential habitat. We suggest a seasonal closure option may be appropriate to minimize these impacts.

### **Environmental Justice and Community Involvement**

The FEIS should identify how the proposed alternatives may affect the mobility of low-income or minority populations in the surrounding area and provide appropriate mitigation measures for any anticipated adverse impacts as defined under Title VI of the Civil Rights Act of 1964 and Executive Order 12898. Executive Order 12898 addresses Environmental Justice in minority and low income populations; more information can be found regarding Environmental Justice at EPA's website: (<http://www.epa.gov/compliance/ej/index.html>).

### **Coordination with Tribal Governments**

Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes. The DEIS

states that CNF “routinely consults 13 tribes” however, only two Tribes are listed as having received copies of the DEIS (p117). EPA recommends the FEIS describe the process and outcome of government-to-government consultation between the BLM and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.

### **National Historic Preservation Act and Executive Order 13007**

The proposed Travel Management project plans to bring 25 previously unclassified roads into the NFSRs. This could involve ground disturbance, including grading, filling, vegetation clearing, paving, and increased vehicle traffic. This disturbance could have significant impacts on cultural, particularly tribal, resources. Thirteen Indian tribes have cultural affinity to sites in the CNF. EPA encourages the CNF to refer to Indian Sacred Sites Executive Order No. 13007.

Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under the NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer (SHPO/THPO).

Executive Order 13007, Indian Sacred Sites (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site.

### **Clean Water Act Section 404**

Discharge of material into waters of the U.S. (jurisdictional waters) requires a permit from the United States Army Corps of Engineers (USACE) pursuant to Section 404 of the Clean Water Act. EPA recommends the CNF consult with the USACE regarding the extent of jurisdictional waters on the project site and the potential impacts to such waters from roads. The FEIS should include a description of road improvements needed to bring previously unclassified roads into the NFSRs, such as resurfacing, ditching, culverts, and vegetation removal. Descriptions should include the total length of each road and the number of stream crossings that might need improvements. If the improvements would result in a discharge of fill material into waters of the United States, the CNF should obtain all necessary Clean Water Act section 404 permits from the USACE and comply with EPA’s 404(b)(1) guidelines. For more information regarding jurisdictional delineation and the permitting process, contact: Jess Laurie, Project Manager, USACE at 520-584-1677.

### **Records and Data on File**

EPA encourages the CNF to include more detailed analyses of the project’s environmental impacts in the FEIS. The DEIS references supporting data and studies used to identify the affected environment and project alternatives, and states that more information may be found in the project record located at the Coconino National Forest Supervisor’s Office. To facilitate public and decisionmaker review, summaries of such data and studies should be included in the FEIS.