



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

December 13, 2010

Mr. Chris Knopp
Forest Supervisor
ASNFs Travel Comments
Apache-Sitgreaves National Forests
P.O. Box 640
Springerville, AZ 85938

Subject: Draft Environmental Impact Statement for the Public Motorized Travel Management Plan, Apache-Sitgreaves National Forests, Apache, Coconino, Greenlee, and Navajo Counties, AZ (CEQ# 20100425)

Dear Mr. Knopp:

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 travel management project, and feels the proposed action is a positive step in addressing resource impacts from motorized uses. The elimination of cross country motorized travel off designated routes should result in significant environmental benefits.

We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"), however, due to our concerns regarding the scope of the travel management planning process, impacts from user created routes, and potential effects on aquatic and other sensitive resources. We recommend that the FEIS provide additional information on the scope of the alternatives analysis, on future planning for specific designated routes, the potential effects of climate change on the proposed action, and monitoring and enforcement commitments. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one CD-ROM to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project, at (415) 947-4221 or gerdes.jason@epa.gov.

Sincerely,

/s/

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

Enclosures:
Detailed Comments
Summary of Rating Definitions

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE PUBLIC MOTORIZED TRAVEL MANAGEMENT PLAN, APACHE-SITGREAVES
NATIONAL FORESTS, APACHE, COCONINO, GREENLEE, AND NAVAJO COUNTIES, AZ,
DECEMBER 13, 2010**

Scope of the Alternatives Analysis

The scope of the proposed action includes prohibiting motor vehicle use off the designated system, adding existing unauthorized user-created roads and trails to the forest transportation system (FTS), and reclassifying certain existing National Forest System (NFS) roads as NFS trails. We commend the Forest Service for surveying unauthorized routes and for considering resource impacts in the selection of routes to add to the FTS.

We believe additional information is needed, however, to explain how the proposed action fulfills the requirements of the Travel Management Rule (36 CFR Part 212). The DEIS mentions that the travel analysis process (TAP) was completed in 2008, and identified “the minimum road system needed to manage the forests.” The TAP recommended that approximately 1,180 miles of roads be designated as open to motor vehicles. This total was deemed insufficient—primarily due to public comments indicating a strong desire for “increased motorized access for dispersed camping and motorized big game retrieval.” Responding to these concerns, the Forest Service ultimately developed the modified proposed action, Alternative B, which would include 2,673 miles of roads designated for motor vehicle use. Not enough detail has been provided, however, to discern whether Alternative B is the only alternative that satisfies the minimum requirements of the TMR, or if one of the alternatives with a smaller footprint, such as Alternative E (crafted to address impacts to resources from motorized use, which was identified by the public as one of the major issues during scoping), does as well.

Recommendation:

The FEIS should evaluate each alternative against the minimum requirements of the Travel Management Rule.

Alternative Selection

The modified proposed action and preferred alternative--Alternative B--would include 2,673 miles of roads designated as open for motor vehicles, close 493 miles of currently open roads to motor vehicle use for resource protection, and would designate five areas (totaling 459 acres) as open to all motor vehicles.

Alternative E, by comparison, would include 2,473 miles of roads designated as open for motor vehicles, close 559 miles of currently open roads, and would not include designated areas open to all motor vehicles. It was formulated to address public concerns about the impacts to resources from motorized use, impacts characterized in the DEIS as “increased sediment deposits in streams...the spread of invasive plants across the forests, disturbances to a variety of plant and wildlife species, and the risk of damaging cultural resource sites.” Alternative E would “impact the least amount of plant

species and their habitat of all the alternatives,” as well as produce the “least direct effect” to watersheds of all five alternatives, including fewer road/stream crossings and “fewer miles within 300 feet of perennial, intermittent, and ephemeral streams, lakes, and wetlands.”

Recommendation:

EPA is concerned about the potential impacts to sensitive habitats, particularly aquatic resources, if the proposed action were to be adopted. Therefore, we recommend implementing Alternative E.

Off-Road Motorized Vehicle Use

EPA is concerned that demand for recreation opportunities on public land, including Apache-Sitgreaves National Forests, may be exceeding the capability of the land and resources to provide recreation in a manner that is consistent with resource and ecosystem protection. Executive Order 11644, “Use of Off-Road Vehicles on Public Lands,” requires agencies to ensure that the use of off-road vehicles on public lands will be controlled and directed. EPA believes it is important that ecosystem protection and sustainability be ensured in the face of increasing recreational use of motorized vehicles, an environmental challenge that is particularly acute in Arizona, because, as the DEIS states, “the number of OHVs in Arizona has risen dramatically.” Additionally, the areas proposed as open to motor vehicles in the preferred alternative are located in the watershed of the Little Colorado River, which has a high sediment load. This is a concern, because, as the DEIS states on page 86, “off-road vehicle use on the forest adds significantly to the risk of sediment contamination to streams.”

Recommendation:

The FEIS should demonstrate how the motorized travel management plan will bring motorized uses and road/trail use into compliance with laws, regulations, and associated direction for protection of water quality, fisheries and wildlife, as well as provide access for management and public use and recreation.

User-created Routes

On some NFS lands, repeated use by motor vehicle travel has resulted in unplanned motorized trails unauthorized for motorized use. These trails were generally developed without environmental analysis or public involvement and may be poorly located and cause unacceptable impacts. EPA is concerned with the addition of unauthorized user-created roads and trails to the FTS that may not have undergone site-specific environmental analysis or public involvement.

Recommendation:

The FEIS should state how the Forest Service would ensure specific user-created routes are adequately evaluated pursuant to NEPA requirements. Where prior site-specific environmental analysis has not occurred, we recommend the FEIS specify the manner and criteria by which each user-created route would be

analyzed prior to the route's addition to the FTS or its designation for public motorized use.

Climate Change

The DEIS does not consider the effects of climate change on route designations, nor the cumulative effects of climate and route designations on species and habitats. Climate change effects and the need to adapt to such effects should be considered in this action because a change in the timing and quantity of precipitation may increase the vulnerability of native surface roads and trails to erosion and sedimentation. Furthermore, roads and their use also contribute to species stress through habitat fragmentation, increased disturbance, introduction of competing invasive species, and increased fire risk, all of which may further exacerbate species' ability to adapt to the changing climate. Assessing climate change risks and developing an adaptation strategy for this proposed action would be in keeping with recently issued Forest Service documents, including the "Strategic Framework for Responding to Climate Change," as well as Chief Tidwell's November 20, 2009 memo to Forest Service staff calling for climate action plans.

Recommendation:

The FEIS should include a discussion of climate change and its potential effects on the proposed action as they relate to route designation decisions and the final FTS. Of specific interest are potential cumulative effects of climate change and the FTS on the connectivity of wildlife and threatened and endangered species habitat, air quality, water quality and quantity, fire management, invasive species management, and road maintenance.

Monitoring and Enforcement

It is important that wildlife protection, vegetation management, and erosion control goals be achieved to minimize the potential adverse effects of the Travel Management Plan. We believe the public and decision makers would benefit if a strategy is developed that includes specific information on funding, monitoring and enforcement criteria, thresholds, and priorities.

Recommendations:

We recommend development of a detailed Travel Management Plan Monitoring and Enforcement Strategy. Such a strategy should include specific information on monitoring and enforcement priorities, focus areas (e.g., issues, specific locations), personnel needs, costs, and funding sources. 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 or exacerbate already identified road-related resource impacts. We recommend the monitoring and enforcement strategy be periodically updated (e.g., annually or biennially).