



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

11/12/2010

Tom Quinn
Forest Supervisor
Attn: Travel Management Team
631 Coyote Street
Nevada City, CA. 95959

Subject: Final Environmental Impact Statement for Tahoe National Forest
Motorized Travel Management Plan, Nevada, Placer, Plumas, Sierra and
Yuba Counties, CA (CEQ# 20100404)

Dear Mr. Quinn:

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 comments on the supplemental Draft Environmental Impact Statement (SDEIS) on April 12, 2010. We rated the SDEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding the scope of the travel management planning process, timely achievement of the Truckee River and Squaw Creek Total Maximum Daily Load requirements, the continued use of roads and trails in areas containing Naturally Occurring Asbestos (NOA), and potential impacts to water quality, meadows, and riparian areas. We also advised that additional information was needed to fully describe monitoring and enforcement commitments.

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 SDEIS. We support the Forest Service's decision to exclude routes requiring mitigation from the Motor Vehicle Use Map (MVUM) until the mitigation measures are successfully completed. EPA notes that the Forest Service has tested all routes in areas "most likely" to contain NOA and determined that three routes (H35-20-1,

YRN-509, and YRN-7) pose a significant risk of human exposure to NOA. The Forest Service intends to complete mitigation that will require that these routes be encapsulated prior to public motorized use. We recommend that this mitigation also include the posting of signage to inform users where NOA is present or where airborne asbestos is found at hazardous levels. We refer you to EPA Regions 9's asbestos web page at <http://www.epa.gov/region9/toxic/noa/> and the California Air Resources Board's (CARB) asbestos web page at <http://www.arb.ca.gov/toxics/asbestos/asbestos.htm> for useful information on NOA. CARB's web site also addresses California's Asbestos Airborne Toxic Control Measures for Surfacing Applications which apply to unpaved roads. EPA would be happy to assist your office by answering questions regarding sampling protocols and how to inform users about the presence, risks, and avoidance of NOA in the area.

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). We continue to believe that a more holistic approach to travel management planning would better serve the long-term interests of the public, Forest Service, and National Forest resources. We recommend that the Forest Service identify the minimum road system needed, pursuant to 36 CFR Part 212 Subpart A, as soon as possible, 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 appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for this project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

/S/

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

cc: David Arrasmith, Forest Planner, Tahoe National Forest
Steve Thompson, California Operations, US Fish and Wildlife Service
Carolyn Suer and Carl Brown, California Air Resources Board