UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JAN 12 2010

Sue Warren
Team Leader
Stanislaus National Forest
Attn: Motorized Travel Management
19777 Greenley Road
Sonora, CA 95370

Subject: Final Environmental Impact Statement for Stanislaus National Forest Motorized Travel Management, Alpine, Calaveras, Mariposa, Tuolumne Counties, CA (CEQ# 20090412)

Dear Ms. Warren:

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 and the switch from unmanaged to managed motorized recreational use will result in significant environmental benefits.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for Stanislaus National Forest Motorized Travel Management and provided comments to the Forest Service on May 6, 2009. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns with the conversion of closed routes to open, the enforceability of closure periods, limited data supporting the proposed season-of- use dates, and potential effects on water resources and threatened, endangered, and sensitive species and their habitat.

We appreciate the efforts of the Forest Service and its consultants to respond to our comments on the DEIS. We note that, in the Record of Decision (ROD), the Forest Service has reduced the impacts that the Proposed Action (Modified Alternative 1) would have on sensitive or endangered species by eliminating a number of routes and shortening the total miles of routes that occur in known or potentially sensitive habitat. We note that, similarly, the ROD reduces impacts to water, soil, and botanical resources by further eliminating National Forest Transportation System (NFTS) route segments deemed likely to have adverse impacts on these

resources. We appreciate that the Forest Service has committed to keeping closed those routes currently in need of mitigation until such time as the required mitigation is completed. Furthermore, we note that the Forest Service has included a discussion of climate change impacts in the Final EIS (FEIS).

While we acknowledge the constraints of funding and resources, EPA remains concerned that the Forest Service has not yet completed the minimum road system analysis, as required by the Travel Management Rule, subpart A. We believe that the completion of subpart B in the absence of subpart A may hinder a more holistic evaluation of the transportation system and limit opportunities to identify and address impacts that NFTS routes have on sensitive and non-sensitive resources. Our concerns regarding the conversion of currently closed routes to open NFTS routes, as proposed by FEIS Alternative 1, also remain. Considering the discussed budget limitations, we continue to be concerned about the Forest Service's ability to fully maintain and enforce the expanded Stanislaus NFTS.

In addition, while EPA appreciates the Forest Supervisor's intent in trying to simplify the NFTS Season of Use closures, we are concerned that the Modified Alternative 1 put forth in the ROD may pose a significant risk to sensitive species, habitat, and resources. By changing 167.21 miles of routes from seasonal closure to open year round, the Forest Service is likely increasing the negative impacts on resources adjacent to these routes. Also, the complete elimination of wet weather closures will likely result in further degradation of water quality, soil, botanical, and wildlife resources. We believe that the impact of this proposed modification needs to be further analyzed before implementation. We recommend that the Forest Service reconsider this modification and/or develop a specific plan for mitigating the impacts of this action.

Achieving a balance between public access and the protection of sensitive resources is a challenge. Route designations are only part of what is needed to reduce the ongoing adverse impacts to natural resources from the National Forest Transportation System. We continue to believe that a 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 best serve the long-term interest 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 Carter Jessop, the lead reviewer for the project. Carter can be reached at (415) 972-3815.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

cc: Steve Thompson, California Operations, US Fish and Wildlife Service
Kenneth D. Landau, Central Valley Regional Water Quality Control Board
Park Superintendent, Yosemite National Park