UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901
NOV 0 9 2009

Chris Sanders, Team Leader
Travel Management Project
Sequoia National Forest
1839 South Newcomb Street
Porterville, CA 93257

Subject: Final Environmental Impact Statement for Sequoia National Forest Motorized Travel Management, Tulare County, CA (CEQ#20090342)

Dear Mr. Sanders:

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 reviewed the Draft Environmental Impact Statement (DEIS) for Sequoia National Forest Motorized Travel Management and provided comments to the Forest Service on April 17, 2009. We rated the DEIS as *Environmental Concerns – Insufficient Information (EC-2)* due to concerns regarding the scope of the travel management planning process, the addition of existing unauthorized routes in watersheds with significant soil and water resource impairment, the continued use of routes within four condor roost areas, and the protection of sensitive habitats adjacent to designated routes. Furthermore, we were concerned about the continued use of up to 55 routes that may intersect potential naturally occurring asbestos (NOA).

We appreciate the efforts of the Forest Service and its consultants to respond to our comments on the DEIS. We note that the Final Environmental Impact Statement (FEIS) presents six alternatives and includes a new preferred alternative (Modified Alternative 3) that was developed based on public concerns over access at Lake Isabella and impacts to condor roost areas. In consultation with the U.S. Fish and Wildlife Service, the Forest Service has agreed to close all unpaved roads in the Basket Pass Condor Roost Area and monitor the areas that were historically used by condors. We also note that the FEIS contains a comprehensive analysis of air resources, including an excerpt on climate change, and that the number of subwatersheds with extreme, high, or moderate potential for Cumulative Watershed Effects has decreased. EPA commends the Forest Service for their efforts to address the many challenges inherent in developing a balanced Motorized Travel Management Plan that responds to recreational and resource management demands.

EPA remains concerned, however, about the continued use of up to 55 routes in areas with potential NOA. Asbestos fibers can remain airborne for as long as ten days, posing a potentially significant human exposure hazard. The FEIS states that proposed routes and open areas must have a site-specific analysis to determine if NOA is present, but no further information on the implementation of such a plan is presented. There appears to be no attempt to minimize or restrict the use of routes which may intersect potential NOA. EPA recommends that site-specific analysis and laboratory testing be conducted as soon as feasible. We also recommend minimal or restricted use of routes which may intersect potential NOA until the presence or absence of NOA is confirmed.

We note that the FEIS presents cost estimates for annual maintenance needs within the project area that are significantly lower than those presented in the DEIS (table T-3; table T-4). We recommend that the Forest Service reexamine these data to ensure there are no errors in these tables.

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. When the Record of Decision (ROD) is signed, please send one copy to the address above (mail code: CED-2). Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Ann McPherson, the lead reviewer for this project. Ann can be reached at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

cc: Steve Thompson, California Operations, US Fish and Wildlife Service
Jesse Grantham, California Condor Coordinator, US Fish and Wildlife Service
Central Valley Regional Water Quality Control Board, Fresno Office
Carl Brown, Asbestos Program, California Air Resources Board