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

SEP 28 2011

Mr. Gar Abbas
Jarbidge and Ruby Mountains District Ranger
Humboldt-Toiyabe National Forest
2035 Last Chance Road
Elko, Nevada 89801

Subject: Final Environmental Impact Statement for the Mountain City, Ruby Mountains, and Jarbidge Ranger Districts Combined Travel Management Project, Elko and White Pine Counties, Nevada (CEQ# 20110261)

Dear Mr. Abbas:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Forest Service on June 18, 2010. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to 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 recommended selection of Alternative 5, and requested additional information regarding the scope of the alternatives analysis, future planning for specific designated routes, the potential effects of climate change on the proposed action, and monitoring and enforcement commitments.

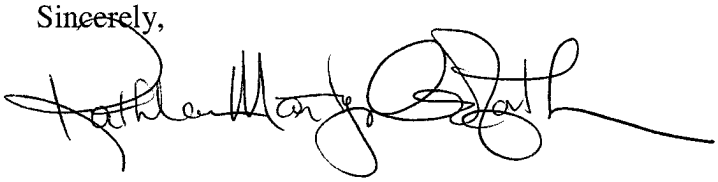
We reiterate our recommendation that the Forest Service implement Alternative 5, identified in the FEIS as the "Reduced Resource Impacts" alternative. In our DEIS letter, we expressed concern about the potential impacts to aquatic resources and roadless areas if the proposed action (Alternative 2) were to be adopted. Concerns about the proposed action's potential impacts to sensitive habitats were first raised by the public during scoping, prompting the development of Alternative 5, and were acknowledged by the Forest Service in the DEIS. In its response to the EPA regarding our recommendation to implement Alternative 5, the Forest Service states that the FEIS "looks at the effects of roads and trails in aquatic habitat" as well as inventoried roadless areas, and that district rangers will use this analysis to determine potential adverse impacts on these resources, to decide whether to designate a road or trail in aquatic habitat, and to implement monitoring or mitigation measures to reduce impacts. These are pragmatic protective measures; however, they seem at odds with the proposed action, which is the alternative that includes the most routes for motorized travel as well as the most routes in inventoried roadless areas. Alternative 5 would provide the greatest protection to sensitive resources and should be considered when the Forest Service develops the Record of Decision for this project.

The FEIS addresses the major issues pertaining to the scope of the alternatives analysis and impacts from user-created routes identified in our review of the DEIS. The EPA commends the Forest Service for developing two items that we recommended in our DEIS comment letter: a monitoring and mitigation plan; and an enforcement strategy for seasonal restrictions and route closures. Additionally,

we thank the Forest Service for addressing another one of our recommendations by including an analysis of the effects of climate change on route designations in the FEIS. We recommend that the Forest Service expand on this analysis by adopting another of our suggestions: to develop an adaptive management plan to assess, and respond to, potential climate-induced changes to the road network.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at (415) 947-4221 or gerdes.jason@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office (CED-2)