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

June 7, 2010

Edward C. Cole
Forest Supervisor
Sierra National Forest
1600 Tollhouse Road
Clovis, CA 93611

Subject: Final Environmental Impact Statement for Sierra National Forest Motorized Travel Management, Fresno, Mariposa, and Madera Counties, CA (CEQ# 20100158)

Dear Mr. Cole:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the above-referenced project. Our review and comments are 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 Sierra National Forest Motorized Travel Management and provided comments to the Forest Service on June 17, 2009. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding the scope of the travel management planning process and the continued use of roads and trails near fens, wet meadows, riparian habitat, and vernal pools. We advised that additional information was needed to fully describe monitoring and enforcement commitments, effects of climate change, and future planning for specific designated routes.

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 DEIS. 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. We note that the Record of Decision (ROD) minimizes impacts to soil

and water by only adding routes where adverse impacts can be avoided or mitigated to acceptable levels, and includes a commitment to this mitigation.

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). EPA had hoped the Forest Service would take this opportunity to review and rationalize the NFTS, pursuant to Travel Management Rule direction, to identify the minimum road system needed (36 CFR Part 212 Subpart A); 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 continue to believe that such a holistic approach to travel management planning would better serve the long-term interests of the public, Forest Service, and National Forest resources, and we recommend the Forest Service implement Subpart A as soon as possible.

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 Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

/s/ Ann McPherson for

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

cc: Steve Thompson, California Operations, US Fish and Wildlife Service
Kenneth Landau, Central Valley Regional Water Quality Control Board, Fresno Office