



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

October 29, 2019

Mr. M. Stephen Best  
Forest Supervisor  
Apache-Sitgreaves National Forests  
Travel Management Plan Comments  
30 South Chiricahua Drive, P.O. Box 640  
Springerville, Arizona 85938

Subject: Revised Draft Environmental Impact Statement for Apache-Sitgreaves National Forests Public Motorized Travel Management Plan, Apache, Coconino, Greenlee, and Navajo Counties, Arizona (EIS No. 20190205)

Dear Mr. Best:

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 recognizes the alternatives in the RDEIS reflect the changed conditions since the DEIS was published, including changes related to the 2011 Wallow Fire, and the publication of the revised Land Management Plan in 2015. The EPA submitted a comment letter to the Forest Service for the DEIS on December 13, 2010. We included recommendations or asked for additional information on several topics, including the scope of the alternatives analysis, off-road motorized vehicle use, user-created routes, and monitoring and enforcement. We appreciate the detailed responses, and additional information included in the RDEIS, to address our comments, including a thorough description of how the action alternatives satisfy the minimization requirements of the Travel Management Rule; a more robust climate change analysis; and a substantive description of the strategy the Forest Service will employ to monitor and enforce the travel management plan. We also note the changes that were made to the proposed action to reduce potential impacts, such as reducing the number of motorized areas from five areas (encompassing 459 acres) to just one 17-acre area.

*Potential Impacts from Big Game Retrieval*

The preferred alternative (Alternative 2—The Proposed Action) would authorize motorized big game retrieval within a 1-mile distance off the designated road and motorized trail system. The 1-mile-wide corridors would run along either side of 2,693 miles of roads and motorized trails, which would represent 87 percent of routes open for public use. The RDEIS notes that big game retrieval would not be allowed in several areas, including designated and recommended wilderness areas, Blue Range Primitive Area, areas closed to motorized use by Forest Order, and Forest plan management areas unsuitable for motorized use (such as research natural areas); however, it does not describe the process or rationale for how the 1-mile-wide corridor was established for the preferred alternative. Alternative 3, which was developed in part to address potential impacts to resources from motorized use, would eliminate motorized access for big game retrieval entirely. We suggest the Forest Service analyze and

consider adopting a narrower or more restrictive corridor, which accommodates big game retrieval while providing for greater protection to sensitive resources.


*Recommendations:*

Include in the FEIS a description of how the 1-mile-wide corridor for motorized big game retrieval was established in the preferred alternative.

Provide additional information regarding the potential impacts to resources associated with authorizing a 1-mile-wide corridor for big game retrieval and assess the potential for a narrower corridor to further reduce potential impacts.

We note that effective October 22, 2018, the EPA no longer includes ratings in our comment letters. Information about this change and the EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act>. The EPA appreciates the opportunity to review this RDEIS, and we are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: TIP-2). If you have any questions, please contact me at 415-947-4161, or contact Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

  
Connell Dunning, Acting Manager  
Environmental Review Branch