



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**12/18/2020**

Ref: 8ORA-N

Diana Trujillo, Forest Supervisor  
Pike and San Isabel National Forests  
2840 Kachina Drive  
Pueblo, Colorado 81008

Dear Supervisor Trujillo:

The U.S. Environmental Protection Agency Region 8 reviewed the U.S. Department of Agriculture (USDA) Forest Service's Pike and San Isabel National Forests (PSI NFs) Public Motorized Travel Management (MVUM) Final Environmental Impact Statement (EIS), CEQ No. 20200226. Our comments are provided for your consideration pursuant to our responsibilities under Section 102(2)(C) of the National Environmental Policy Act and Section 309 of the Clean Air Act. Please note that this letter is not intended as an objection under the Forest Service's objection process, rather it is intended to inform the Record of Decision.

Our review of the Final EIS found the document mostly unresponsive to our comments on the Draft EIS. This is of concern because many watersheds in the PSI NFs exhibit degraded conditions correlating with "Severe" erosion hazard, described by the USDA Natural Resources Conservation Service as follows: "Significant erosion can be expected. Roads require frequent maintenance. Costly erosion control measures are needed." However, the PSI's road system has an ongoing annual maintenance backlog of approximately 64.37 % and the Proposed Action only decreases the backlog by 9 %, the least among the action alternatives. The preferred alternative also appears to largely leave unaddressed the routes contributing to degraded water resource conditions. For example, based on Appendix C, the Proposed Action does not include changes or actions to address the majority of road segments that pose severe ("HH") watershed risk. In contrast, all the other action alternatives, including the alternative that emphasizes public motor vehicle use and recreation, do address the vast majority of these roads by either decommissioning, converting to administrative or special permit use only, or planning for application of specific mitigation techniques. A similar pattern is seen when looking at roads with either high ("H") or severe watershed risk, though even a smaller proportion (134/536 by our count) of these road segments have management recommendations under the Proposed Action that would address those high risks. As such, the document does not explain how the Proposed Action would minimize effects of roads on watershed resources. This is important as the minimum road system is defined in the EIS as that needed to reflect long-term funding expectations and ensure minimization of adverse environmental impacts. Note that in our analysis, we did not consider converting roads to trails open to vehicles to be a mitigation measure because the EIS provides no explanation for how or to what extent converting roads to trails open to vehicles will mitigate the adverse effects that those roads are having on watershed

health. We recommend revising the ROD and selecting an alternative that affords more watershed protection to help move the PSI's aquatic resources toward their desired future conditions.

An additional concern is with the system's potential effects to fen wetlands. The Final EIS adds a screening criterion for fens for the purpose of considering and minimizing damage to these wetlands when designating trails and areas (pursuant to 36 CFR § 212.55b). However, it is not apparent that this screening criterion was used in the designation of motorized trails and areas. It is not added on page 2-10 of the FEIS, which describes what was considered in minimizing impacts to motorized trails and areas, nor was it added as a consideration to the tables in Appendix C, which include the screening criteria for each motorized route and area. In addition to trails and areas, it is also not clear if roads are currently having impacts on fen wetlands or if fens were considered in the designation and management of roads open to public motor vehicle use. We recommend ensuring the consideration of whether the road and trail system is currently impacting fens, and if roads or trails are impacting these wetlands, selecting appropriate mitigation or decommissioning as necessary to protect these irreplaceable resources.

We appreciate your consideration of our comments at this stage of the NEPA process and hope that they may be useful in preparing the Forest Service's Record of Decision. If you have any questions or concerns, please contact me at (303) 312-6704, or Melissa McCoy, lead reviewer for this EIS, at (303) 312-6155 or [mccoy.melissa@epa.gov](mailto:mccoy.melissa@epa.gov).

Sincerely,



Philip S. Strobel  
Chief, NEPA Branch  
Office of the Regional Administrator



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