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Comments: The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Forest Service's May 2024 Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Over-Snow Travel Management Project (#65529) within the Rio Grande National Forest. In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), we are providing scoping comments. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact on any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The Rio Grande National Forest is planning to complete a travel management plan for over-snow motorized vehicles across approximately 1,382,276 acres (74 percent) of Rio Grande National Forest lands. There are currently 260 miles of permitted and groomed motorized routes in the planning area. The proposal would restrict public over-snow vehicle use in Special Designation Management areas.

The project is expected to result in an Over-Snow Vehicle Use Map and a Winter Recreation Opportunity Spectrum Map that delineates the planning area using designations such as "primitive" and "semi-primitive" that allow for differing levels of over-snow vehicle use.

Key Topics the EPA Recommends the Forest Service Address through the NEPA Process

There are several important analysis components for this type of project that we recommend including within the scope of analysis for the EIS:

- * A range of alternatives for reaching management objectives and environmental desired future conditions outlined in the Rio Grande National Forest Land Management Plan;

- * Environmental resource objectives and site-specific baseline conditions, including vegetation cover and condition, soil conditions, ecological site descriptions, watershed conditions, water

quality, sediment loads, wetland and riparian health, wildlife/fish population, habitat health and

trends, and air quality;

- * A discussion of prior management history in the project area relating to over-snow travel management, such as an overview of previous over-snow travel management plans and over-snow vehicle compliance;

- * A project timeline, milestones, and anticipated end dates to help the public and the Forest Service more accurately predict the timing and magnitude of impacts from the proposed action.

- * Site-specific impacts or benefits to baseline resource conditions that would likely result from over-snow activities associated with each alternative and a comparative assessment of how each alternative will affect the attainment of management objectives and environmental desired future conditions;

- * Consideration of minimization and mitigation measures to address any identified potential

adverse impacts to resources; and

- * A detailed monitoring plan that will be used to assess how well the eventual selected

alternative addresses concerns associated with each resource category.

Based on preliminary information, our initial areas of interest for the Rio Grande Over-Snow Travel Management Project include: (1) road and trail development; (2) water quality; (3) air quality; (4) noise pollution; (5) monitoring and compliance; (6) wildlife and special-status species; (7) environmental justice communities; (8) climate-related impacts and greenhouse gas emissions; (9) recreational safety; and (10) invasive species. We recommend the EIS disclose the environmental effects on resources associated with each alternative in a manner that will allow for the decision-maker to effectively plan to reduce potential impacts to such resources to the greatest extent possible.

The EPA appreciates the opportunity to provide comments at this early stage of the NEPA process. These comments are intended to facilitate the decision-making process. Thank you for considering our input. If further explanation of our comments is desired, please contact me at (303) 312-6155 or mccoy.melissa@epa.gov, or Greyson Abid, lead reviewer for this project, at (303) 312-6425 or abid.greyson@epa.gov.