

SAGUARO NATIONAL PARK
ARIZONA
NATIONAL PARK SERVICE
U.S. DEPARTMENT OF THE INTERIOR



Saguaro National Park

Abbreviated Final
General Management
Plan / Environmental
Impact Statement

January 2008

**Abbreviated Final
General Management Plan / Environmental Impact Statement
Saguaro National Park
Pima County, Arizona**

Saguaro National Park was established by President Herbert Hoover on March 1, 1933. Originally named Saguaro National Monument, the status was changed to Saguaro National Park by an act of Congress on October 14, 1994. The last general management plan for the park was completed in 1988. Much has changed since 1988 — visitor use patterns and types have changed, the population of the city of Tucson has doubled, and an additional 7,577 acres have been added to the park. Each of these changes has implications for how visitors access and use the national park and the facilities needed to support those uses, how resources are managed, and how the National Park Service manages its operations. A new plan is needed.

The *Draft General Management Plan / Environmental Impact Statement* examines three alternatives for managing the park for the next 25 years. It also analyzes the impacts of implementing each of the alternatives. The “no-action” alternative, **alternative 1**, consists of continuing the existing park management and trends and serves as a basis for comparison in evaluating the other alternatives. The concept for park management under **alternative 2** would be to protect the park’s ecological processes and biological diversity by reducing fragmentation of wildlife and plant habitats and protecting wildlife corridors. The concept for park management under **alternative 3** would be to provide a wider range of opportunities for visitors that would be compatible with the preservation of park resources and wilderness characteristics. Alternative 2 is the National Park Service’s preferred alternative.

The *Draft General Management Plan / Environmental Impact Statement* was distributed to other agencies and interested organizations and individuals for their review and comment. This *Abbreviated Final General Management Plan / Environmental Impact Statement* presents the comments and agency responses and a correction (errata) sheet that shows the minor changes that need to be made to the draft. The draft and the abbreviated final constitute a full final document. Because these changes were minor, the National Park Service has permission to print this abbreviated document.

For further information, please contact the superintendent, Saguaro National Park, 3693 South Old Spanish Trail, Tucson, AZ 85730-5601.

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INTRODUCTION

This is an abbreviated *Final General Management Plan / Environmental Impact Statement* for Saguaro National Park. The material included here is to be combined with the *Draft General Management Plan / Environmental Impact Statement*, which was distributed for public review August 1, 2007. The 60-day public review period ended October 3, 2007. The abbreviated format has been used because the changes to the draft document are relatively minor and do not modify the analysis provided in the *Draft General Management Plan / Environmental Impact Statement*.

Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 *Code of Federal Regulations* or CFR 1503.4 (c)). The draft and abbreviated final documents together present the full *Final*

General Management Plan / Environmental Impact Statement, its alternatives, associated environmental impacts, and comments that have been received and evaluated and responses to them.

Following the announced release of this *Abbreviated Final General Management Plan / Environmental Impact Statement* in the *Federal Register*, there will be a 30-day no-action period. A “Record of Decision” of the approved final plan will then be signed by the regional director, Intermountain Region, National Park Service (NPS), and copies will be made available to the public.

For further information, please contact the superintendent, Saguaro National Park, 3693 South Old Spanish Trail, Tucson, AZ 85730-5601.

CONSULTATION AND COORDINATION

This section summarizes the agency, organization, and public comments received on the *Draft General Management Plan / Environmental Impact Statement*. These comments allow interested parties (including NPS decision-makers) to review and assess how other agencies, organizations, and individuals have responded to the proposed actions and alternatives and their potential impacts. The National Park Service provides responses to those comments that are considered substantive or when responses are helpful for clarification or other purposes.

Substantive comments are those that (1) question, with reasonable basis, the accuracy of information in the environmental impact statement, (2) question, with reasonable basis, the adequacy of environmental analysis, (3) present reasonable alternatives other than those presented in the environmental impact statement, or (4) cause changes or revisions in the proposal.

PUBLIC REVIEW

A notice of availability of the *Draft General Management Plan/ Environmental Impact Statement* was published in the *Federal Register* on August 1, 2007. The draft document was distributed to the public August 2, 2007. The official review and comment period began on August 5, 2007, and ended October 3, 2007. Approximately 3,000 individuals received either a copy of the document or a CD-ROM version of the document or were notified by postcard that the document was available on the NPS Planning, Environment, and Public Comment (PEPC) website. These individuals also received information about the dates, times, and locations of three public open house meetings held in the Tucson area. The availability of the document and information

about the public meetings were also announced in the local newspaper.

Three public meetings were held. On September 5, 2007, meetings were held from 11:00 a.m. to 1:00 p.m. at Pima Community College Downtown and from 4:00 p.m. to 7:00 p.m. at Picture Rocks Intermediate School. On September 6 a meeting was held from 4:00 p.m. to 7:00 p.m. at Pima County Community College East. At each of these open house meetings, a separate station was provided for those members of the public who were interested in the *Comprehensive Trails Plan* being conducted as a separate planning effort. A total of 84 individuals attended the meetings. Public comments were recorded by the planning team.

The *Draft General Management Plan/ Environmental Impact Statement* was also sent out certified return receipt mail on August 1, 2007, to 12 tribes (federally and state recognized) that have been identified as having a cultural affiliation with the park. The tribes were asked to review the draft document and provide the National Park Service with comments. One tribe responded with no comments on the draft document.

Approximately 190 written and electronic comments were received. The public did not present any new alternatives and public comment analysis did not result in any modifications to the current alternatives. Letters from federal, state, and local governments and organizations are reproduced on the following pages, as required. These entities either supported alternative 2 or had no comment. The Environmental Protection Agency commented on climate change; the NPS response is included in the comments and responses below.

The public's comments have been considered by the Park Service in preparing this *Abbreviated Final General Management Plan/ Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503. The following section summarizes substantive comments and contains the NPS response. The National Park Service responses make factual changes, clarify or provide new information, or explain why the public comments do not warrant further agency response.

COMMENTS AND RESPONSES

Comment: The United States Environmental Protection Agency rated the draft document as LO — Lack of Objections. However, they recommended that the “plan address the potential effects of climate change on park resources and how the National Park Service will adaptively manage affected resources.” (This letter is reproduced in this document.)

NPS Response: Because the issue of global climate change is an emerging scientific field, the *General Management Plan* did not address this topic specifically. As part of NPS inventorying and monitoring efforts the park staff will establish a program to track associated effects on park resources as a result of climate change. If and when effects are identified through this program, the park staff would then recommend necessary changes in management policies, but at this stage, there is not enough information to calculate or quantify impacts or to recommend management strategies at the general management planning level. This is true for all associated resources mentioned related to climate change, including but not limited to water resources, vegetation, habitat, wildlife, and cultural resources. Therefore, no change is needed to the *General Management Plan / Environmental Impact Statement*.

Comment: Several individuals commented on the proposed restriction of off-trail hiking below 4500' in the Tucson Mountain District (page 83). The commenters suggested that this restriction limits opportunities for solitude and unconfined recreation, freedom, orienteering, and that it reduces wildlife and nature observation opportunities. They also suggested it was a violation of the Wilderness Act that is intended to promote high-quality opportunities for solitude and primitive recreation.

NPS Response: The National Park Service is mandated to protect resources while allowing for appropriate recreational opportunities. The Tucson Mountain District in Saguaro National Park contains natural and cultural resources that are highly sensitive to recreation-related impacts. The *General Management Plan* proposes a restriction of “off-trail” activity below 4,500 feet for both districts to concentrate use and associated impacts along designated trails, which are designed and maintained to minimize resource impacts. As noted throughout the environmental consequences section, even small amounts of off-trail travel causes vegetation loss, soil compaction, and habitat fragmentation, and such travel facilitates intentional, as well as unintentional, loss of archeological and other sensitive cultural and natural resources. As residential development around the Tucson Mountain District increases and more people seek to explore the park off-trail, these impacts would increase.

Providing the highest level of protection for the park's sensitive vegetation and cultural resources below 4,500 feet is the motivation for restricting travel in the park to designated trails. The intent is to keep areas outside the designated trail system in a relatively undisturbed state. This is also consistent with management of the Rincon Mountain District. The Wilderness Act

(Public Law 88-577) does not prohibit the management of visitor use to protect resources, and it allows for primitive facilities such as trails and campsites to facilitate travel and concentrate recreation-related impacts. As referenced throughout the document, the National Park Service is evaluating new trail opportunities as part of the *Saguaro National Park Comprehensive Trails Plan* in some areas of the Tucson Mountain District that currently lack designated trails. These new trail opportunities will be designed to sustain visitor activity, and will provide access to areas of the park that currently are only accessible through off-trail activities. Further, the park will increase efforts to educate visitors about less crowded times of the day, week, and year and use levels on different trails to help them find plentiful opportunities for solitude and immersion in nature while staying on the designated trail system. Therefore, no change is needed to the *General Management Plan / Environmental Impact Statement*.

Comment: A commenter favored the creation of ADA-accessible trails (page 83), but felt that any trail developed in the southwestern section of the Tucson Mountain District (natural zone on alternative map) was in the park's only badger habitat and possible construction of a paved trail was unadvisable. The commenter further indicated that this area was the only place in either district where badgers were observed and where dens and digging could be found.

NPS Response: The park staff appreciates the commenter's concern for the identified species; NPS resource managers are also concerned about the continued well-being of this species and the habitat required for its survival. Although badgers have been identified in this location, the historic range for this animal was throughout the area, including both park districts and the Tucson Mountain Park. Contemporary

sightings indicate that, while uncommon, badger populations are more widespread, especially in the Tucson Mountain District, so this is not the only location where badgers have been observed. Where trails are proposed as part of the *Comprehensive Trails Plan*, NPS staff would seek trail alignments that avoid badger habitat and dens and implement best management practices to minimize disruptions to known populations. If specific potential impacts on badgers are identified, NPS staff would develop methods to mitigate these impacts. It is unlikely that trail construction or subsequent use would appreciably impact badgers, and more unlikely that such an activity would alter their population. Therefore, no change is needed to the *General Management Plan / Environmental Impact Statement*.

Comment: A commenter expressed their fear that the "facts were being shaped to support the park's preferred alternative regarding the road kill count-by-extrapolation, which makes it seem worse than we who are on these roads daily have observed."

NPS Response: The *General Management Plan* does not quantify animals killed under the existing conditions or proposed alternatives. Rather, it recognizes the relative impacts of the alternatives on wildlife populations. We do know that park wildlife is killed by automobile traffic, and that one of several objectives in this *General Management Plan* is to improve conditions that adversely impact park wildlife. The preferred alternative would do this if roadway improvements are put into operation. In addition, animals killed on park roads, referred to in the document as "road kill," was only one of several criteria the park staff considered when looking at methods to improve the existing conditions on Picture Rocks Road as described on pages 25 and 61. Therefore, no changes are needed to the *General Management Plan / Environmental Impact Statement*.

Comment: A comment was received concerning air quality issues (page 34) as follows:

“Chapter 1 addresses air quality issues in the Natural Resources Section of the Plan. EPA is proposing revisions to the primary ozone standard and is also proposing the addition of a secondary ozone standard to protect public welfare, including limiting environmental damage to sensitive vegetation, and ecosystems. EPA timelines project a June 2008 effective date for the revision. While the Park may have only limited ability to affect the ozone levels in the area, it is important to consider such impacts in finalizing the Plan. To the extent alternatives are available that have lower air emissions those should be favorably considered. EPA projections show that the Tucson area may become a nonattainment area if the standards are finalized as currently proposed. All management and control strategies that result in lower air emissions will help to improve our air quality and will be especially important with the promulgation of new ozone standards.”

NPS Response: Under the current regulations, the park meets National Ambient Air Quality Standards. Although current projections for revising standards indicate June 2008 as the effective date, the regulations have yet to be revised and so current regulations apply. The park is required by law and policy to meet or exceed regulations and will continue to monitor conditions. Under all proposed actions outlined in the *Draft General Management Plan*, park contributions to this problem would be negligible both in the short term during construction and/or implementation and in the long term as part of general management. If conditions and/or standards change in the future, the park would reassess and adjust manage-

ment actions and activities accordingly. Therefore, no changes are needed to the *General Management Plan / Environmental Impact Statement*.

Comment: Concurrently with the *General Management Plan*, the National Park Service is conducting a *Comprehensive Trails Plan* for Saguaro National Park. Some members of the public developed an “alternative C” as part of the trail plan effort. Several commenters on the *General Management Plan* requested feedback on this alternative.

NPS Response: Alternative C is not part of the *General Management Plan / Environmental Impact Statement*. This alternative contains a detailed description of specific trail recommendations (e.g., new trails to open, trails to delete, trails to reopen, and new access points to develop) and is being considered and analyzed as part of the comprehensive trails planning project. The *General Management Plan* does not include this level of specificity for trail planning. The *General Management Plan* does provide long-term, general guidance on the park’s desired natural and cultural resource conditions and visitor experiences, as well as general types/levels of development that direct subsequent trail planning efforts. Therefore, no changes are needed to the *General Management Plan / Environmental Impact Statement*. However, the goal of the *Comprehensive Trails Plan* has been included in the *General Management Plan* as indicated in the correction sheet.

Comment: A commenter questioned the acreage of a use and occupancy reservation (page 11). The document states there is an outstanding reservation of use and occupancy (life estate) on a 40-acre tract in the Rincon District while NPS policy states that such reservations are limited to the homesite and 3 acres.

NPS Response: The 40-acre tract located in the Rincon Mountain District became a life estate in 1972 and is still in effect. At that time there were no policies on the size of life estates. The 1979 Land Acquisition Policy did limit the size of life estates to 3 acres plus the structures. In 2001, a new life estate was added to the Tucson Mountain District under the 1979 policy. This clarification has been included in the correction sheet in this document.

Comment: One commenter did not support the proposal to build a new section of the Bajada Loop Drive (page 78) to move park visitor traffic off Sandario Road to improve safety. It was mentioned that no documentation for this action was provided.

NPS Response: The *Draft General Management Plan* does refer to the high accident rate on the section of Sandario Road where Bajada Loop Road travelers must enter and exit Sandario Road on pages 165 and 205-206. Although the park and county maintain safety records for this section of roadway (among others), the references were not cited in the document. These references have been included in the correction sheet in this document.

Comment: A number of commenter's expressed concern about the use of the right-of-way of the El Paso Gas Company — shown on the alternative 2 map for Tucson Mountain District, page 79 — as a horse, bicycle, and hiking trail. They were concerned about safety.

NPS Response: The gas line right-of-way is currently being used as a trail. The El Paso Gas Company has expressed an interest in cooperating with the park to develop a multiuse trail along this right-of-way. Aside from vehicles involved in pipeline maintenance, no motorized, off-road vehicles would be permitted. The trail is identified in the *Eastern Pima County's Trail System Master Plan*. However, the alternative map for the Tucson Mountain District incorrectly shows a proposed trailhead at the southern terminus of the gas line right-of-way. This trailhead is not planned and will not be developed. A corrected version of the Tucson Mountain District alternative 2 map has been included in this document

Comment: A commenter questioned the absence of two articles on the flora and vegetation of the park's two districts in the selected references.

Response: Thank you. We will add these references.

DRAFT GMP/EIS CORRECTIONS

This section contains those changes that should be made to the *Draft General Management Plan/ Environmental Impact Statement*. Some of these changes are a result of public comments while others are editorial in nature. Please make the following changes:

Page 10 — The Primary Interpretive Themes

The themes have been further refined. Please replace them with the following:

- The dichotomy of the Saguaro Wilderness, so close to a rapidly expanding urban area, provokes and welcomes us to explore the mysteries of nature for spiritual renewal and healing, and also inspires us to protect and preserve similar places.
- Saguaro National Park’s Rincon Mountains are the largest road-less “Sky Island” in the Sonoran Desert — a uniquely pristine and diverse biotic community that provides exceptional opportunities for exploration, education, research, and wonder.
- People have adapted to, influenced, and lived in the Sonoran Desert since prehistoric times; fruit harvesting and hunting, homesteading and grazing, urbanizing and mining, recreating and exploring, resource and fire management are but a few examples of decisions and subsequent impacts that continue to affect this unparalleled landscape.
- The saguaro, the most recognizable cactus in the world, is a symbol with emotional significance spanning centuries and cultures, and it is a keystone species in an interdependent community (of plants, animals, and humans) adapted for living and thriving in this harsh arid environment.

Page 11 — Life Estates

Please replace the sentence with the following. The park contains two life estates or reservations of use and occupancy: a 40-acre parcel in the Rincon Mountain District and a 5-acre parcel in the Tucson Mountain District. Both of these life estates are still in effect. The 40-acre parcel was added in 1972. At that time there were no policies regarding size of life estates. In 1979, the Land Acquisition Policy limited the size of life estates to 3 acres plus the structures. A life estate was added to the Tucson Mountain District in 2001 under the 1979 policy. This life estate is 5 acres, including the structures.

Page 20 — Comprehensive Trail Plan Goal

Please add the following in the first column, before the last sentence: The goal of comprehensive trail plan is to provide a comprehensive, well-designed, sustainable trail system that provides reasonable access and a variety of visitor trail recreation experiences, consistent with the purpose and significance of the park.

Page 79 — the Tucson Mountain District Alternative 2 Map

This map has been revised. The words “proposed trailhead” on the southern terminus of the gas line right-of-way were removed. Please insert the new map provided.

Page 87 — the Tucson Mountain District Alternative 3 Map

This map has been revised. The words “proposed trailhead” on the southern terminus of the gas line right-of-way were removed. The location of state and county land has been indicated. Please insert the new map provided.

Page 104 — Future Studies and Implementation Plans Needed

Please delete the second bulleted item in the first column — the *Fire Management Plan*. This plan has been completed. Add “boundary study” as the last bullet.

Page 165 — Roadway Issues and Concerns

Please add the following sentence to column one, the first paragraph: Since 2003, there have been 20 accidents and 11 injuries in the vicinity of the Sandario/Kinney Road intersection, and 6 accidents and 3 injuries on Golden Gate Road.

Pages 304 and 305 — Appendix A: Legislation

The legislation should be in chronological order. Pages 304–305 should become pages 302–303, and pages 302–303 should become pages 304–305.

Page 368 — Selected References

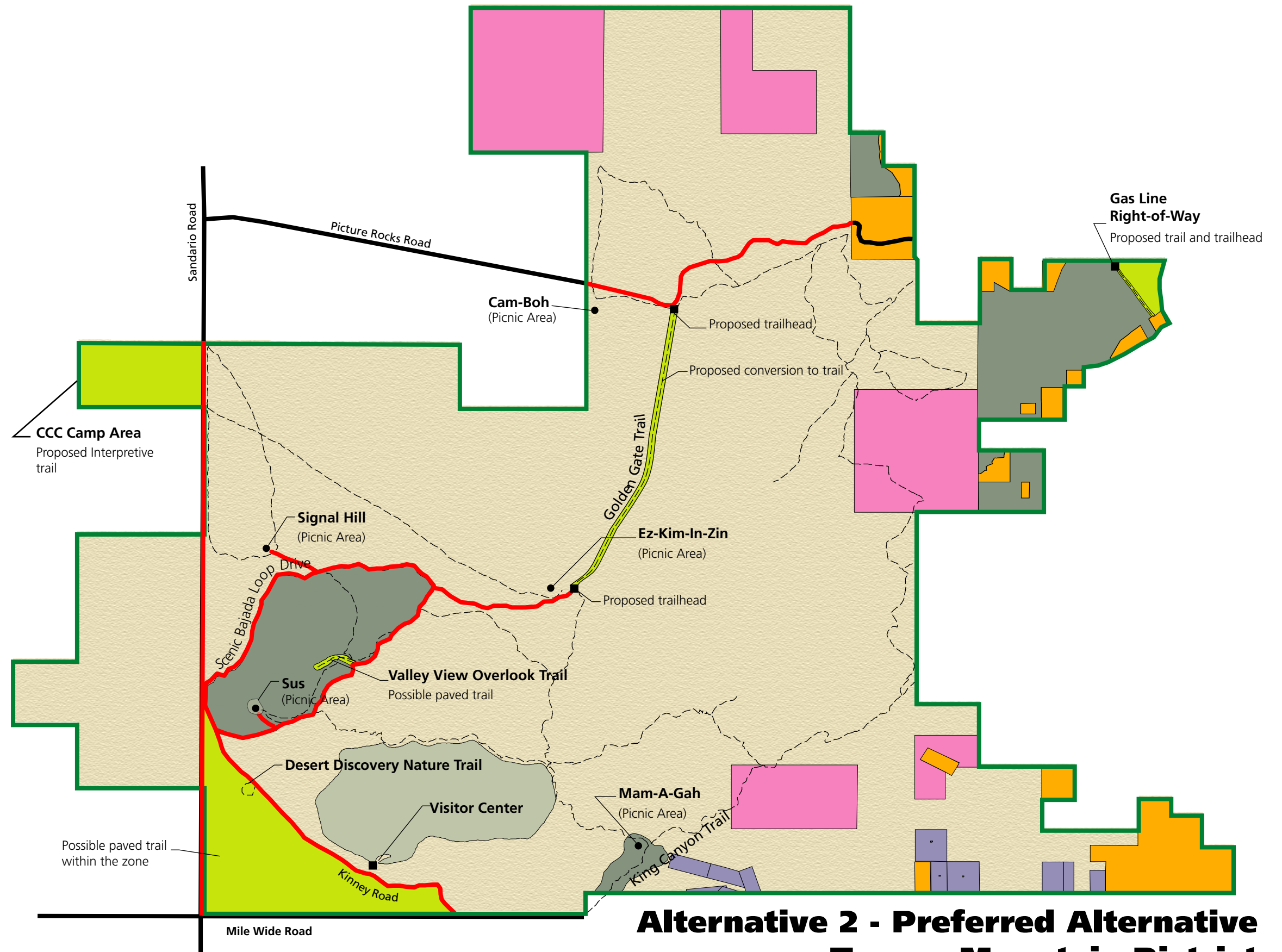
Please add the following:

Bowers, Janice E. and McLaughlin, Steven P.

1987 “Flora and Vegetation of the Rincon Mountains, Pima County, Arizona”. *Desert Plants*. 8(2): 50-94.

Renée Rondeau, Thomas R. Van Devender, C. David Bertelsen, Philip Jenkins, Rebecca K. Wilson, and Mark A. Dimmitt

1996 “Annotated Flora and Vegetation of the Tucson Mountains, Pima County, Arizona.” University of Arizona for Boyce Thompson Southwestern Arboretum.



Legend

- PARK BOUNDARY
- TRAIL
- STATE LAND
- COUNTY LAND
- PRIVATE LAND

Management Zones

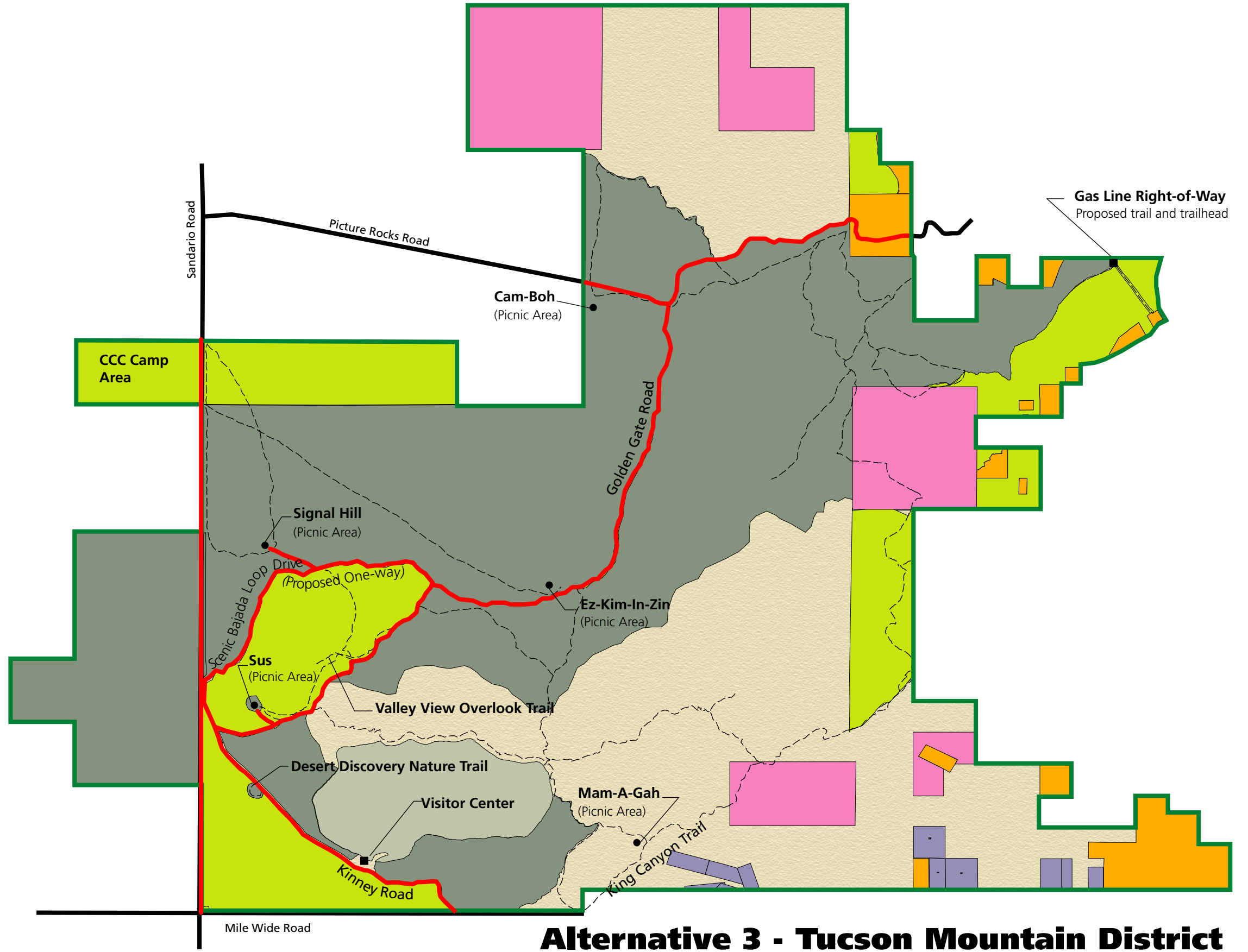
- SENSITIVE ZONE
- PRIMITIVE ZONE
- SEMI-PRIMITIVE ZONE
- NATURAL ZONE
- SIGHTSEEING CORRIDOR ZONE
- DEVELOPED ZONE



Alternative 2 - Preferred Alternative Tucson Mountain District

Legend

- PARK BOUNDARY
 - TRAIL
 - STATE LAND
 - COUNTY LAND
 - PRIVATE LAND
- Management Zones**
- SENSITIVE ZONE
 - PRIMITIVE ZONE
 - SEMI-PRIMITIVE ZONE
 - NATURAL ZONE
 - SIGHTSEEING CORRIDOR ZONE
 - DEVELOPED ZONE



Alternative 3 - Tucson Mountain District

General Management Plan Saguaro National Park



AGENCY AND ORGANIZATION LETTERS

FEDERAL AGENCIES



Preserving America's Heritage

September 13, 2007

Sarah Craighead
Superintendent
Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85730

REF: *Notification for Development of General Management Plan
Saguaro National Park, Arizona*

Dear Ms. Craighead:

The Advisory Council on Historic Preservation (ACHP) recently received your notification for the development of a General Management Plan for the Saguaro National Park, Arizona, pursuant to stipulation VI.D. of the 1995 Programmatic Agreement Among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. We encourage the park to continue consulting with the Arizona State Historic Preservation Officer (SHPO) and interested Native American tribes, as well as other interested parties, in the development of this plan.

Should the park determine, in consultation with the SHPO, tribes, and other consulting parties, that its preferred alternative may have an adverse effect on properties listed or eligible for listing on the National Register of Historic Places, we request that you notify us of the adverse effect and provide adequate documentation for our review. The ACHP's decision to participate in the consultation to resolve adverse effects to historic properties will be based on the applicability of the criteria in Appendix A of the ACHP's regulations, "Protection of Historic Properties" (36 CFR part 800).

Thank you for providing us with this opportunity to comment. If you have any additional questions or require the further assistance of the ACHP, please contact Kelly Yasaitis Fanizzo at (202) 606-8583, or by email at kfanizzo@achp.gov.

Sincerely,

Reid Nelson
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

September 26, 2007

Superintendent Sarah Craighead
Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85730-5601

Subject: Saguaro National Park Draft General Management Plan/Environmental Impact Statement (EIS), Pima County, Arizona [CEQ #20070322]

Dear Ms. Craighead:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

The National Park Service's (NPS) Preferred Alternative involves numerous improvements and positive operational changes to better protect Saguaro National Park's resources over the next 25 years. In addition, the Draft EIS identifies many effective mitigation measures and adaptive management strategies that could be used to protect or reduce impacts to cultural and natural resources, visitor safety and experiences, and socioeconomic environment, among others. Therefore, we have rated this Draft EIS as LO – Lack of Objections (see the enclosed "Summary of Rating Definitions").

In light of the long life of the plan and the Government Accountability Office's recent report, "Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources" (August 2007), we recommend that the General Management Plan address the potential effects of climate change on park resources and how NPS will adaptively manage affected resources. For example, climate change could influence long-term vegetation trends in the park where increases in exotic plant species produce fuel for larger and more frequent wildland fires. Increased severity and frequency of wildland fires could destroy more native plants and transform some vegetation communities into annual grasslands. These impacts could further increase the fire danger, erosion, sedimentation, and chemical and nutrient loads in surface waters, resulting in adverse impacts to water quality and quantity, valuable desert riparian areas, and species diversity. The Draft EIS briefly addresses water quantity as an issue that was dismissed from further consideration because the management alternatives would have negligible adverse impacts on water quantity in the park. An analysis of water quality appears to have been overlooked as it is neither discussed nor dismissed from further

FEDERAL AGENCIES

consideration in the Draft EIS. Both these resources should be addressed in light of the cumulative, long-term effects that could result from climate change.

EPA recommends that the Final EIS include analyses of the potential impacts of climate change, over the life of the General Management Plan, on park resources such as water quality and quantity, vegetation/habitat and exotic species, wildlife, special status species, species diversity, and cultural resources. The Final EIS and General Management Plan should discuss how NPS plans to adaptively manage affected resources, including operational and monitoring needs.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3846, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

A handwritten signature in black ink, appearing to read "Nova Blazej", with a large, stylized flourish extending to the right.

Nova Blazej, Manager
Environmental Review Office

004142
Enclosure

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."