

December 28, 2017

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Draft Revised Land Management Plan and DEIS Comments

Mr. Dallas and Planning Team:

The following discussions and recommendations are in referenced to providing for the integrated planning of the Continental Divide National Scenic Trail (CDNST) Congressionally Designated Area through the Forest Plan revision processes.

I am offering the following comments with respect to the proposed land management plan and DEIS in the light of the 2012 Planning Rule and NEPA regulations along with applicable Forest Service directives. Designated areas are specific areas or features within the plan area that have been given a permanent designation to maintain its unique special character or purpose. The Plan should, in part, address the following guidance (FSH 1909.12 part 14):

1. Types, purposes, and locations of established designated areas within the plan area. The Responsible Official should use a map to identify these locations.
2. Range of uses, management activities, or management restrictions associated with the established designated areas in the plan area.
3. Existing plans for the management of established designated areas within the plan area, such as comprehensive plans for national scenic or historic trails.

For planning team reference and for the planning record, I have attached the latest version of a CDNST Planning Handbook, which addresses many aspects of planning for this National Scenic Trail—**Attachment A**. The CDNST Planning Handbook will continue to be updated as needed on the NSTrail.org website.

The posted DEIS geospatial data has been useful in this review. Supplemental DEIS or FEIS geospatial data should provide public access to the following geospatial information:

- Administrative Boundaries (FSH 1909.12 22.2)
- Land Ownership (FSH 1909.12 22.2)
- Designated Areas, including Recommended Wilderness, Wilderness Study Areas, Eligible Wild & Scenic Rivers, Inventoried Roadless Areas, and the extent of the CDNST management corridor/rights-of-way to be established (FSH 1909.12 22.2 and 24)

- Recreation Opportunity Spectrum Classes to be established – Summer and Winter (FSH 1909.12 22.2 and 23.23a)
- Scenic Integrity Objectives to be established (FSH 1909.12 22.2 and 23.23f)
- Lands that May be Suitable for Timber Production (FSH 1909.12 Chapter 60)
- CDNST travel route as an independent data layer (FSH 1909.12 23.23l)
- NFS roads and trails with attribute data, including existing road maintenance levels and trail travel route fundamentals such as Designed Use, Managed Use, and Trail Class (FSH 1909.12 23.23l)

Please allow for the copying and pasting of text from published planning documents in the future. This would lead to an improvement in the quality of the information provided to the agency.

### **Draft Forest Plan**

The Continental Divide National Scenic Trail management area corridor core area is addressed in Alternative D. This corridor should be adopted in the Forest Plan with the following modifications:

1. The CDNST and Recommended Wilderness Management Areas should not be established as distinct allocations when sharing the same geographic landscape. Instead, the allocations should overlap. Where the CDNST corridor overlaps with Recommended Wilderness and Wilderness designations the most restrictive plan components would control.
2. The corridor for a high potential route segment to the north of Saguache Park should be part of the described CDNST MA—see **Appendix A**.
3. The extent of the CDNST MA should be expanded to encompass the North Pass Canada lynx linkage area to add additional protection to this lynx habitat and to address the conservation purposes of this National Scenic Trail—see **Appendix B**.

The following are recommendations for CDNST plan component desired conditions, objectives, and standards to be applied to a described Management Area for either the NEPA proposed action or for an alternative to be considered in detail. Additional CDNST plan component recommendations are found in the accompanying CDNST Planning Handbook in Chapter III. Plan components modifications are found. Additions are displayed in italic text characters.

### **Desired Conditions**

DC-CDT-1: Viewsheds from the Continental Divide National Scenic Trail have high scenic values. The ~~foreground of the trail~~ *landscape along the CDNST travel route* is naturally appearing, and generally appears unaltered by human activities. The potential to view

wildlife is high and evidence of ecological processes such as fire, insects, and diseases exists. (Forestwide)

DC-CDT-7: The Continental Divide National Scenic Trail is a well-defined trail that provides for high-quality primitive hiking and horseback riding opportunities, and other compatible nonmotorized trail activities, in a highly scenic setting along the Continental Divide. *The corridor encompasses national trail resources, qualities, values, associated settings and the primary use or uses. This includes vistas, campsites, water sources, and other important resource values.* The significant scenic, natural, historic, and cultural resources along the trail corridor are conserved. Where possible, the trail provides visitors with expansive views of the natural landscapes along the Continental Divide. (Management Area Forestwide)

DC-CDT-8: The setting of the Continental Divide National Scenic Trail corridor is consistent with or complements a primitive or semi-primitive nonmotorized setting. *ROS class inconsistencies are managed to protect CDNST values.* ~~The Continental Divide National Scenic Trail may intermittently pass through more developed settings to provide for a continuous route.~~ (Management Area Forestwide)

DC-CDT-9: The Continental Divide National Scenic Trail is accessible from access points that provide opportunities to select the type of terrain, scenery, and trail length, ranging from long-distance to day use, that best provide for the compatible outdoor recreation experiences being sought. ~~Wild and remote backcountry segments of the route provide opportunities for solitude, immersion in natural landscapes, and primitive outdoor recreation. Front country and more easily accessible trail segments complement local community interests and needs and help contribute to a sense of place.~~ (Forestwide)

DC-CDT-10: Use conflicts among Continental Divide National Scenic Trail users are infrequent. (Management Area Forestwide)

DC-CDT-11: The Continental Divide National Scenic Trail *travel route* is well maintained, signed, and passable. Alternative routes are made available in the case of temporary closures resulting from natural events, such as fire, flood or land management activities. (Forestwide)

### Objectives

OBJ-CDT-1: Restore or relocate ~~two~~ segments of the Continental Divide National Scenic Trail to improve scenic viewing opportunities and/or to provide for a nonmotorized experience. (Forestwide)

### Standards

*\_ . Manage the CDNST travel route as a visual quality concern level 1 travel route. Resource management actions must meet a Scenic Integrity Level of Very High or High (2009 CDNST Comprehensive Plan, Chapter IV(B)(4)). (Forestwide)*

*\_ . Resource management actions and allowed uses must be compatible with maintaining or achieving Primitive or Semi-Primitive Non-Motorized ROS class settings, except motor vehicle use is allowed if such use is in accordance with the 2009 CDNST Comprehensive Plan, Chapter IV(B)(6) and FSM 2353.44b(11). (Management Area)*

*\_ . Motorized and mechanized use by the general public may only be allowed where such use is in accordance with the 2009 CDNST Comprehensive Plan, Chapter IV(B)(5)&(6) and FSM 2353.44b(10) and (11). (Management Area)*

*\_ . Road construction and reconstruction for public use is prohibited; excepted are motor vehicle use circumstances described in the 2009 CDNST Comprehensive Plan Chapter IV(B)(6) and FSM 2353.44b(11). (Management Area)*

S-CDT-1: The congressionally designated trail corridors are not suitable for oil and gas or geothermal energy development, or other leasable mineral activities. (Management Area ~~Forestwide~~)

S-CDT-2: No common variety mineral extraction (e.g., limestone, gravel, pumice, etc.) ~~shall~~ *may* occur on or within the congressionally designated trail corridors. (Management Area ~~Forestwide~~)

~~S-CDT-3: Motorized events and motorized special use permits shall not be permitted on nonmotorized segments of the Continental Divide National Scenic Trail. Motorized events and special use permits could be authorized along existing motorized trail segments not yet converted to nonmotorized use. (Forestwide)~~

S-CDT-4: Management activities in the congressionally designated trail corridors ~~shall~~ *must* be consistent with, or make progress toward achieving, high or very high scenic integrity objectives to protect or enhance scenic qualities. (Management Area ~~Forestwide~~)

*\_ . Other uses that could conflict with the nature and purposes of the CDNST may be allowed only where there is a determination that the other use would not substantially interfere with the nature and purposes of the CDNST (16 USC 1246(c)). (Management Area)*

*\_ . Where the CDNST corridor overlaps with Wilderness designations the most restrictive measures control. (Management Area)*

## Guidelines

G-CDT-1: To retain or promote the character for which the *national* trail was designated, new or relocated trail segments should be located primarily within settings consistent with or complementing primitive or semi-primitive nonmotorized recreation opportunity spectrum classes. To the extent possible, avoid road and motorized trail crossings and other signs of modern development. (Management Area Forestwide)

~~G-CDT-2: To protect or enhance the scenic qualities of the Continental Divide National Scenic Trail, management activities should be consistent with, or make progress toward achieving scenic integrity objectives of high or very high within the foreground of the trail (up to 0.5 mile on either side). (Forestwide)~~

G-CDT-3: If forest-health projects result in short-term impacts to the scenic integrity of the trail, mitigation measures should be included, such as screening to reduce short-term impacts to the scenic integrity from management activities adjacent to the trail. (Forestwide)

G-CDT-4: In order to promote a nonmotorized setting, the Continental Divide National Scenic Trail *travel route* should not be permanently relocated onto routes open to motor vehicle use. (Forestwide)

G-CDT-5: Provide adequate trail facilities to accommodate the amount and types of use anticipated on any given segment to provide for visitor health and safety. Facilities provided should be minimal in order to preserve or promote a setting that appears natural. (Forestwide)

G-CDT-6: New communication sites, utility corridors, and renewable energy sites should not be allowed within the visible foreground (~~up to one-half mile~~) and middle-ground viewshed (~~up to 4 miles~~) to protect the scenic values of the trail. (Forestwide)

~~G-CDT-7: Limit linear utilities and rights-of-way to a single trail crossing unless additional crossings are documented the only prudent and feasible alternative. (Forestwide)~~

~~G-CDT-8: New temporary or permanent roads or motorized trail construction across or adjacent to the Continental Divide National Scenic Trail should be avoided unless needed for resource protection, private lands access, or to protect public health and safety. This provides for a naturally appearing setting while avoiding visual, aural, and resource impacts from motorized use. (Forestwide)~~

G-CDT-9: The use of the Continental Divide National Scenic Trail for landings or as a temporary road for any purpose should not be allowed to provide for a naturally appearing setting while avoiding visual, aural, and resource impacts. (Management Area Forestwide)

~~G-CDT-10: Allow hauling or skidding along the trail only when the trail is collocated with an open road and no other options are available. Apply design criteria to minimize impacts to trail infrastructure. (Forestwide)~~

G-CDT-11: Manage unplanned fires in the foreground (up to one-half mile) of the trail using minimum impact suppression tactics, or other appropriate tactics, for the protection of the congressionally designated trail values. Allow heavy equipment line construction within the corridor only when necessary for emergency protection of life and property. (Management Area Forestwide)

G-CDT-12: Manage wildfires and prescribed fires ~~within 0.5 mile of trails~~ using strategies and tactics that will minimize impacts and emphasis protection of the congressionally designated trail. (Management Area Forestwide)

~~G-CDT-13: Management of the Continental Divide Trail shall comply with the most recent version of the Continental Divide Comprehensive Plan or other current direction. Forestwide)~~

## **Glossary Recommendations**

Please add the following terms to the glossary:

### National Historic Trail

A congressionally designated trail that is an extended, long-distance trail, not necessarily managed as continuous, that follows as closely as possible and practicable the original trails or routes of travel of national historic significance. The purpose of a National Historic Trail is the identification and protection of the historic route and the historic remnants and artifacts for public use and enjoyment. A National Historic Trail is managed in a manner to protect the nationally significant resources, qualities, values, and associated settings of the areas through which such trails may pass, including the primary use or uses of the trail.

### National Scenic Trail

A congressionally designated trail that is a continuous and uninterrupted extended, long-distance trail so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant resources, qualities, values, and associated settings and the primary use or uses of the areas through which such trails may pass.

### Recreation Opportunity Spectrum:

The Recreation Opportunity Spectrum planning framework is the recognized framework for stratifying and defining classes of outdoor recreation environments, activities, and experience opportunities through forest planning. The settings, activities, and

opportunities for obtaining experiences have been arranged along a continuum or spectrum divided into six classes. The ROS classes should be defined with more detail than provided in the Draft Plan and DEIS as described below.

- **Primitive:** Primitive ROS settings encompass large, wild, remote, and predominately unmodified landscapes. Additional primitive ROS settings are scattered across the forest, often surrounded by SPNM settings. Primitive ROS settings contain no motorized and mechanized vehicles and there is little probability of seeing other people. They provide quiet solitude away from roads and people or other parties, are generally free of human development, and facilitate self-reliance and discovery. Signing, and other infrastructure is minimal and constructed of rustic, native materials. Ecological processes such as fire, insects, and disease exist. Standard: Motor and mechanized vehicles are not allowed in established Primitive settings. Guidelines: (1) No new permanent structures should be constructed in desired Primitive ROS settings to maintain the unmodified character of these landscapes; (2) Less than 6 parties per day encountered on trails and less than 3 parties visible at campsite; and (3) Setting should essentially be an unmodified natural environment. No roads, timber harvest, or mineral extraction are allowed. Suitability: (1) Motorized and mechanized recreation travel are not suitable; (2) The SIO of Very High is suitable; and (3) Lands are not suitable for timber production. (Inventory criteria: 3 miles from motorized use.)
- **Semi-Primitive Nonmotorized:** Semi-Primitive Non-Motorized settings provide opportunities for exploration, challenge, and self-reliance. Rustic structures such as signs and foot bridges are occasionally present to direct use and/or protect the setting's natural and cultural resources. These rustic constructed features are built from native materials or those that mimic native materials. Closed and revegetated roads may be present but do not dominate the landscape or detract from the SPNM experience of visitors. Ecological processes such as fire, insects, and disease exist. Standard: Motor vehicle use by the general public is not allowed. Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPNM settings; (2) Less than 15 parties per day encountered on trails and less than 6 parties visible at campsite; and (3) Vegetative management may range from prescribed fire to very limited timber harvest for the purpose of maintaining a healthy, attractive semi-primitive setting. Suitability: (1) Motorized recreation travel is not suitable; (2) The SIO of High or Very High are suitable; and (3) Lands are not suitable for timber production. (Inventory criteria: ½ to 3 miles from all roads, trails, rivers, lakes and railroads with motorized use.)
- **Semi-Primitive Motorized:** Semi-Primitive Motorized settings provide motorized recreation opportunities in backcountry settings. Routes are designed for Off

- Highway Vehicles (OHVs) and high clearance vehicles that connect to local communities, access key destinations and vantage points, provide short day trips on scenic loops or facilitate longer and even overnight expeditions. Visitors challenge themselves as they explore vast, rugged landscapes. Mountain bikes and other mechanized equipment may also be present. Facilities are rustic and are used for the purpose of protecting the setting's natural and cultural resources. Bridges are sometimes present to accommodate foot, horse and ATV traffic but are built from native or natural appearing materials that blend with the surrounding landscape and maintain the semi-primitive character of the setting. There may also be nodes that function as portals for visitors to park their ATVs and explore adjacent Semi-Primitive Non-Motorized and Primitive settings. (Inventory criteria: ½ mile from primitive motorized roads and trails, not closer than ½ mile of better than primitive roads.)
- **Roaded Natural:** I recommend that the proposed action and alternatives be modified that described the following subclasses:
    - Roaded Natural - Mostly equal opportunities to affiliate with other groups or be isolated from sights and sounds of man. The landscape is generally natural with modifications moderately evident. Concentration of users is low to moderate, but facilities for group activities may be present. Challenge and risk opportunities are generally not important in this class. Opportunities for both motorized and non-motorized activities are present. Construction standards and facility design incorporate conventional motorized uses.
    - Roaded Modified - Roaded Modified has been used as a subclass of RN by several Forests and Regions for many years. Roaded Modified has typically been defined as areas exhibiting evidence of forest management activities that are dominant on the landscape. Examples of RM include heavily logged areas, evidence of mining, oil/gas, or other minerals extraction activities.
  - **Rural:** Area is characterized by a substantially modified natural environment. Opportunities to affiliate with others are prevalent. The convenience of recreation sites and opportunities are more important than a natural landscape or setting. Sights and sounds of man are readily evident, and the concentration of users is often moderate to high. Developed sites, roads, and trails are designed for moderate to high uses.

**Wilderness Character:**

Wilderness Character reflects the nature of wilderness being untrammeled, undeveloped, natural, and having outstanding opportunities for solitude or a primitive and unconfined type of recreation.

- **Untrammeled**—The Wilderness Act states that wilderness is “an area where the earth and its community of life are untrammeled by man,” and “generally appears to have



been affected primarily by the forces of nature.” In short, wilderness is essentially unhindered and free from modern human control or manipulation. This quality is degraded by modern human activities or actions that control or manipulate the components or processes of ecological systems inside the wilderness.

- Natural—The Wilderness Act states that wilderness is “protected and managed so as to preserve its natural conditions.” In short, wilderness ecological systems are substantially free from the effects of modern civilization. This quality is degraded by intended or unintended effects of modern people on the ecological systems inside the wilderness since the area was designated.
- Undeveloped—The Wilderness Act states that wilderness is “an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation,” “where man himself is a visitor who does not remain” and “with the imprint of man’s work substantially unnoticeable.” This quality is degraded by the presence of structures, installations, habitations, and by the use of motor vehicles, motorized equipment, or mechanical transport that increases people’s ability to occupy or modify the environment.
- Solitude or a primitive and unconfined type of recreation—The Wilderness Act states that wilderness has “outstanding opportunities for solitude or a primitive and unconfined type of recreation.” This quality is about the opportunity for people to experience wilderness; it is not directly about visitor experiences per se. This quality is degraded by settings that reduce these opportunities, such as visitor encounters, signs of modern civilization, recreation facilities, and management restrictions on visitor behavior.

### **Draft Environmental Impact Statement**

The Forest should select Alternative D and establish a CDNST Management Area. This alternative (and only this alternative) proposes the addition of a management area (MA 4.23) for congressionally designated trails, including the CDNST. According to FSM 2353.44b, “the land management plan for an administrative unit through which the CDNST passes ... “must [except where the CDNST traverses a wilderness area] establish a management area for the CDNST that is broad enough to protect natural, scenic, historic, and cultural features.” FSH 1909.12 describes that, “the Interdisciplinary Team should use other information to delineate a national scenic and historic trails corridor that protects the resource values for which the trail was designated or is being proposed for designation (16 U.S.C 1244(b))... , [and] “[t]he Responsible Official shall include plan components that provide for the nature and purposes of national scenic and historic trails in the plan area.” Alternative D with modifications identified in the Draft Forest Plan section of these comments would provide the necessary framework to protect the nature and purposes of the CDNST.

The Continental Divide National Scenic Trail Management Area corridor is not addressed in Alternative A, B, and C. This omission is inconsistent with the National Trails

System Act as implemented through Executive Order 13195, the 2009 CDNST Comprehensive Plan, Forest Service directives, and guidance found in Federal Register Notice 74 FR 51116. Alternatives A, B, and C should be modified or not further developed in the FEIS.

Wilderness evaluations and NEPA assessments should describe the positive CDNST benefits if the Pole Mountain, Finger Mesa, Bristol Head, Chama Basin, Summit Peak, and Elwood Pass Roadless Areas are recommended for wilderness designation. Protecting wilderness values would include establishing a plan component that identifies recommend wilderness as not being suitable for motor vehicle use and mechanized transport. Management of recommended wilderness to protect wilderness characteristics supports the conservation purposes of this National Scenic Trail and is fully compatible with the CDNST nature and purposes.

Forest Service land management plans shall form one integrated plan for each unit (16 U.S.C. 1604(f)(1)). The plan and developed NEPA alternatives must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area as follows: ... (b)... (1) The plan must include plan components, including standards or guidelines, to provide for: (i) Sustainable recreation; including recreation settings, opportunities, and access; and scenic character..., and (vi) appropriate management of other designated areas or recommended designated areas in the plan area...(36 CFR 219.10(b)(i)&(vi)). The CDNST is a congressionally designated area (36 CFR 219.19).

The Purpose and Need for Action section of the DEIS should describe the need to provide integrated resource management, including providing for the purposes for which Congressional designated areas are established such as protecting the nature and purposes and related values of National Scenic and Historic Trails.

The DEIS on page 17 states, *“The Old Spanish National Historic Trail and the Continental Divide National Scenic Trail are addressed through inclusion of desired conditions, objectives, standards, and guidelines for congressionally designated trails. Additionally, in alternative A both trails are identified as linear features on the Nationally Designated Trails map.... The direction does not include the visual buffers or the plan direction.”* Note that the existing Forest Plan states, “STANDARDS 1. A Scenic Integrity Objective of "High" (“management activities are not evident to the casual visitor and the area appears natural”) will be met within the within the foreground for all National Scenic and Recreation Trails.” (Forest Plan III-32)

The DEIS on page 289 provides a general national overview of the CDNST Affected Environment. However, the description does not described the environment of the area to be affected by the alternatives under consideration as required by 40 CFR 1502.15. The Affected Environment section should describe the degree to which current management

direction is protecting the values for which each National Trail was designated, including protecting cultural landscapes, recreation settings, scenic integrity, and addressing the conservation purposes of each National Trail.

The DEIS on page 290 describes CDNST direct and indirect effects, but erroneously describes that, *“Alternative A does not have any specific management direction for any congressionally designated trails on the Forest.”* In any case, the following statement is accurate, which describes management actions along the CDNST that are substantially degrading CDNST values: *“Generally, uncontrollable impacts result from public use and vandalism. Natural processes such as wind and water cause soil erosion, and these impacts to the trails would continue to occur. The action alternatives include management activities that include timber management, permitted grazing, prescribed burning, wildlife and fisheries management, facilities construction and maintenance, road and trail construction, recreation use and management, and special uses authorization to third parties.”*

The DEIS states, *“Alternatives B and C include plan direction that presents a balanced approach to managing these linear features in a multiple use environment. Similar to other alternatives, the direction will continue to contribute to social and economic sustainability in the broader landscape and connect citizens to the land through education, interpretation, stewardship projects, and volunteerism. Effects are anticipated to be positive, resulting in more public understanding of the shared values around both trails, and include the potential for a more educated and stewardship-minded public... Alternative B includes the trails in the Specially Designated Geographic Area, with the corridor mapped as a linear feature crossing multiple management areas. Alternative C addresses the trails similarly but includes the trails in the Specially Designated Management Area... Many segments of the Continental Divide National Scenic Trail on the Forest are not located on the Continental Divide. Alternative D establishes the Congressionally Designated Trail Management Area, which in some areas overlaps with existing wilderness and Colorado roadless areas. Alternative D also converts management approaches related to these trails, used as optional plan content in alternative B to facilitate adaptive management, to standards and guidelines. Designating the trail as a management area with related standards and guidelines means that if the trail were proposed to be relocated to the Continental Divide itself, the Forest would have to complete an amendment of the forest plan to do so. Amending the forest plan involves more detailed environmental analysis. Recognizing the trail as a linear feature provides more flexibility to Forest managers to relocate segments of the trail as needed.”*

This discussion of Alternative B, C, and D does not address the environmental consequences of these action alternatives on the nature and purposes of National Scenic and Historic Trails. The section fails to form the scientific and analytic base for the comparisons of the alternative under 40 CFR 1502.14. The disclosure is inconsistent with 40 CFR 1502.24, including not using the Recreation Opportunity Spectrum and Scenery Management

System planning frameworks to address the environmental effects of the alternatives. This section is inadequate and is inconsistent with the requirements of 40 CFR 1502.16.

Cumulative Effects are described on page 290 stating, *“Implementation of any of the alternatives could result in short-term impacts that result in long-term benefits. Relocation of trails to improve consistency with historic routes would provide a positive overall experience in the long term. Population increases over time could increase the number of users and therefor impact the trails, and increase user-related conflicts.”* The DEIS disclosure of cumulative impacts is not consistent with 40 CFR 1508.7 failing describe impacts to the nature and purposes of CDNST and Old Spanish NHT.

The EIS should discuss effects on scenic integrity, ROS class conditions, and carrying capacities and will generally be based on analysis of the effects of the allowable uses and conditions of use on National Scenic Trail values that are included in the proposed action and each alternative. Utilizing ROS and Scenery Management System will help ensure that NEPA assessments are systematic and accurately describe the affected environment and expected outcomes from each alternative. The level of precision or certainty of the effects can be guided by the CEQ regulations regarding the use of “methodology and scientific accuracy” (40 CFR 1502.24) and the information needed to support a reasoned choice among alternatives (40 CFR 1502.22). The ROD must clearly document how the final decision is based on the best available science (36 CFR 219.3) or other relevant information needed to understand the reasonably foreseeable adverse effects of a choice between alternatives, the gaps in that information, and the rationale for why a reasoned choice between alternatives can be made at this time. In addition, substantial interference analyses and determinations need to be rigorous and be addressed as part of the cumulative impact analysis (40 CFR 1508.7).

The EIS should recognize that management direction for Semi-Primitive Motorized, Roaded Natural, Rural, and Urban ROS classes allow uses that would substantially interfere with the nature and purposes of a National Scenic Trail if the allocation desired conditions are realized. Where the allowed non-motorized activities reflect the purposes for which the National Trail was established, the establishment of Primitive and Semi-Primitive Non-Motorized ROS classes and high and very high scenic integrity allocations would normally protect the nature and purposes (values) of a National Scenic Trail.

The EIS effects analysis should include cross-tabular tables that explore and disclose the relationship between (1) the proposed CDNST travel route location and management corridor/rights-of-way extent and (2) the intersection and overlap with the proposed ROS Classes and Scenic Integrity Objectives allocations.

For each alternative, the analysis of environmental consequences needs to address how the land management planning decisions will achieve:

1. Providing for the nature and purposes of the National Trail, including protecting the National Trail resources, qualities, values, and associated settings;
2. Identifying the National Trail primary users;
3. Ensuring carrying capacity is not exceeded; and
4. Preventing other uses from substantially interfering with the nature and purposes of the National Trails.

The Forest Supervisor should prepare a Supplement DEIS to further address the requirements of the NEPA CEQ regulations as found in 40 CFR Parts 1500-1508.<sup>1</sup>

### **General Considerations**

I encourage the Forest Supervisor to address the planning for the CDNST in collaboration with the Gunnison (GMUG) Forest Supervisor. **Appendix C** is a map that depicts a recommended CDNST National Trail Management Corridor.

The year 2018 is the 50th Anniversary of the National Trails System Act and the 40th Anniversary of the establishment and designation of the Continental Divide National Scenic Trail. The revised Rio Grande Plan may establish a new standard for the management of National Scenic and Historic Trails on NFS lands, so 2018 will be a good time to reflect on past and current National Trail management practices and to establish appropriate forest plan direction for the future.

Please allow for the copying and pasting of text from published planning documents in the future. This would lead to an improvement in the quality of the information provided to the agency and facilitate commenting.

Thank you for the opportunity to review and comment on the Draft Plan and DEIS.

*/s/ Greg Warren*

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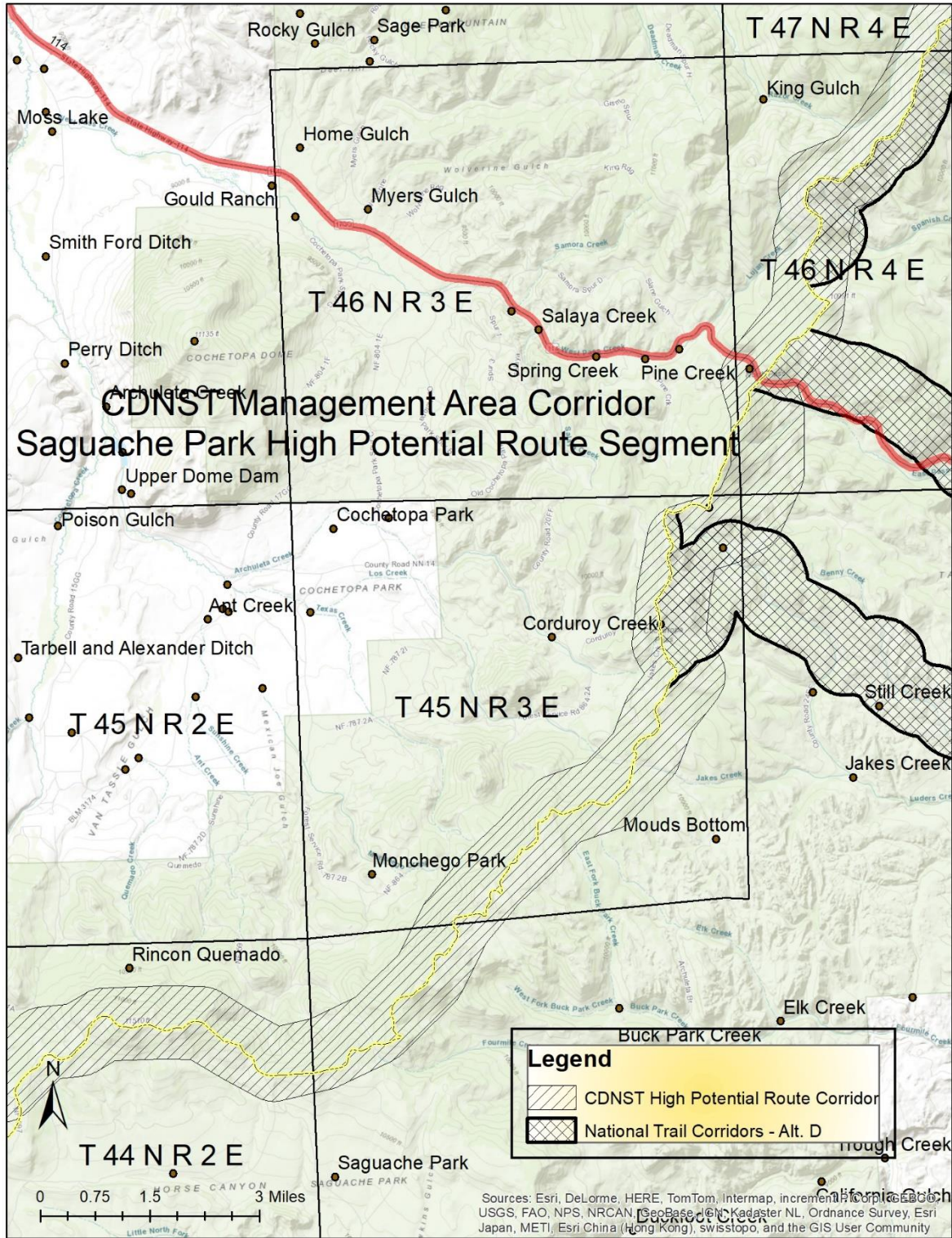
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Attachment: A – CDNST Planning Handbook (version 12.07.2017)

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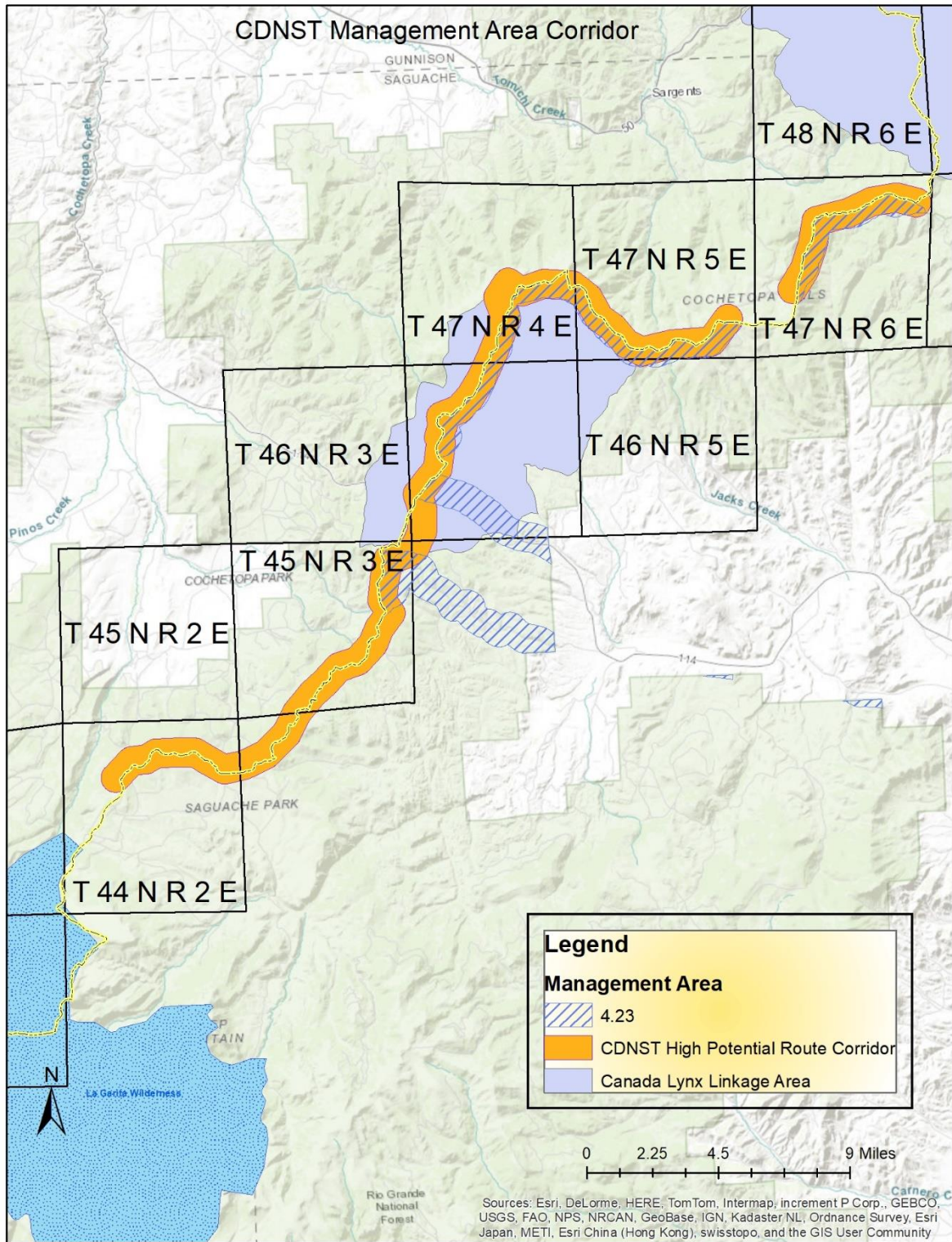
<sup>1</sup> 36 CFR Part 220 does not lessen the applicability of the CEQ 40 CFR 1500 regulations on National Forest System lands (36 CFR 220.1(b)).

**Appendix A – CDNST Saguache Park High Potential Route Segment Corridor**





**Appendix B – CDNST Management Area Corridor and Canada Lynx North Pass Area**





### Appendix C – Potential CDNST Management Area for High Potential Route Segments

