

Forest Plan Revision Team
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The following comments are regarding the Santa Fe National Forest Draft Revised Forest Plan and DEIS. These comments address primarily the planning and management of the Continental Divide National Scenic Trail (CDNST) and the Recreation Opportunity Spectrum (ROS) planning framework.

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Introduction

The following comments primarily address the Continental Divide National Scenic Trail (CDNST). An amended CDNST Comprehensive Plan was published in the Federal Register in 2009, which took effect on November 4, 2009 (74 FR 51116).¹ The amended Comprehensive Plan was approved by Chief Thomas Tidwell in September 2009² (**Attachment A**). An outcome of the amended Comprehensive Plan was the description of the nature and purposes of this National Scenic Trail: *“Administer the CDNST consistent with the nature and purposes for which this National Scenic Trail was established. The CDNST was established by an Act of Congress on November 10, 1978 (16 USC 1244(a)). The nature and purposes*

¹ <https://www.federalregister.gov/documents/2009/10/05/E9-23873/continental-divide-national-scenic-trail-comprehensive-plan-fsm-2350>

² https://www.fs.fed.us/sites/default/files/fs_media/fs_document/cdnst_comprehensive_plan_final_092809.pdf

of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor.” The amended Comprehensive Plan establishes other important direction for the management of the CDNST including:

- The rights-of-way for the CDNST is to be of sufficient width to protect natural, scenic, cultural, and historic features along the CDNST travel route and to provide needed public use facilities.
- Land and resource management plans are to provide for the development and management of the CDNST as an integrated part of the overall land and resource management direction for the land area through which the trail passes.
- The CDNST is a concern level 1 route, with a scenic integrity objective of high or very high.
- Manage the CDNST to provide high-quality scenic, primitive hiking and pack and saddle stock opportunities... Use the Recreation Opportunity Spectrum (ROS) in delineating and integrating recreation opportunities in managing the CDNST.

The CDNST Federal Register Notice (74 FR 51116) provided additional direction to the Forest Service as described in FSM 2350. The final directives add a reference to the CDNST Comprehensive Plan as an authority in FSM 2353.01d; ... add the nature and purposes of the CDNST in FSM 2353.42; and add detailed direction in FSM 2353.44b governing implementation of the CDNST on National Forest System lands.

The Land Management Planning Handbook establishes important guidance that addresses relationships between National Scenic and Historic Trail Comprehensive Plans and Forest Plans. FSH 1909.12 24.43 describe that:

- The Interdisciplinary Team shall identify Congressionally designated national scenic and historic trails and plan components must provide for the management of rights-of-ways (16 U.S.C 1246(a)(2)) consistent with applicable laws, regulations, and Executive Orders.
- Plan components must provide for the nature and purposes of existing national scenic and historic trails...
- The Responsible Official shall include plan components that provide for the nature and purposes of national scenic and historic trails in the plan area.
- The planning directives state that, “FSM 2350 has more information about national scenic and historic trails.” FSM 2353.44(b)(1) requires that a Management Area be established for the CDNST.

The final amendments to the CDNST Comprehensive Plan and corresponding directives...will be applied through land management planning and project decisions following requisite environmental analysis (74 FR 51124).

CDNST management direction enacted through correspondence may supplement, but not supersede, the guidance found in the National Trails System Act, Executive Orders, CDNST Comprehensive Plan, regulations, and directives.

Draft Forest Plan

Need for Changing the 1987 Forest Plan

Draft Plan: The Draft Plan describes on page 16 that, *“The qualities that led to the designation of these areas contribute to social sustainability by connecting people to their natural and cultural heritage and providing recreation opportunities. These areas also contribute to ecological sustainability by preserving intact natural systems and their individual components.”*

Comment: The Draft Plan should have described the need to addressing direction in the 2009 CDNST Comprehensive Plan, E.O. 13195, and related directives.

Timber Suitability

Draft Plan: The Draft Plan on page 115 discusses forest land may be considered as unsuited for timber production.

Comment: The Plan should recognize that timber production and associated activities are inconsistent with Primitive and Semi-Primitive Non-Motorized ROS classes, which are ROS desired settings for the CDNST corridor. Primitive and SPNM settings are not suitable for timber production. In areas of timber production, continuous harvesting, stand tending, road construction and reconstruction, and other activities are incompatible with the desired conditions and indicators. In addition, I recommend that the planning team reevaluate allocating Roaded Natural and Semi-Primitive Motorized settings for areas planned for timber production believing that a Roaded-Modified ROS setting would be more appropriate where extensive timber production activities are expected.

Timber production within the CDNST corridor would be inconsistent with providing for the nature and purposes of this National Scenic Trail. To reflect ROS principles, the CDNST corridor with an extent of one-half mile on each side of the travel route should be identified as not being suitable for timber production. Timber harvest should only occur within the CDNST Management Area to protect CDNST values. Managing the CDNST corridor for Roaded Natural and Semi-Primitive Motorized ROS settings and timber production purposes would lead to management actions that substantially interfere with the nature and purposes of the CDNST, which is not allowed by the National Trails System Act.

Recreation

Draft Plan: The Draft Forest Plan discusses recreation on pages 125 describing that, *“The ROS is a continuum used for managing recreation opportunities, based on a combination of physical, biological, social, and managerial settings, ranging from primeval to paved. The ROS uses the following descriptors for recreation settings ranging from least to most developed: primitive, semiprimitive-nonmotorized, semiprimitive motorized, roaded natural, rural, and urban. These ROS classifications are used in project planning to measure the degree of variation from the existing classification to a new classification.”*

Comment: I recommend that the introduction also briefly describe how each ROS setting or class is defined by desired condition and indicators. Forest Service directives describe, *“Use the Recreation Opportunity Spectrum (ROS) system and the ROS Users Guide (1982) to delineate, define, and integrate outdoor recreation opportunities in land and resource management planning” (FSM 2311.1).*

“Managing for recreation requires different kinds of data and management concepts than does most other activities. While recreation must have a physical base of land or water, the product—recreation

experience--is a personal or social phenomenon. Although the management is resource based, the actual recreational activities are a result of people, their perceptions, wants, and behavior.

While the goal of the recreation is to obtain satisfying experiences, the goal of the recreation resource manager becomes one of providing the opportunities for obtaining these experiences. By managing the natural resource settings, and the activities, which occur within it, the manager is providing the opportunities for recreation experiences to take place. Therefore, for both the manager and the recreationist, recreation opportunities can be expressed in terms of three principal components: the activities, the setting, and the experience.

For management and conceptual convenience possible mixes or combinations of activities, settings, and probable experience opportunities have been arranged along a spectrum, or continuum. This continuum is called the Recreation Opportunity Spectrum (ROS) and is divided into six classes. The six classes or portions along the continuum, and the accompanying class names have been selected and conventionalized because of their descriptiveness and utility in Land and Resource Management Planning and other management applications. The Recreation Opportunity Spectrum provides a framework for defining the types of outdoor recreation opportunities the public might desire, and identifies that portion of the spectrum a given National Forest might be able to provide.

Planning for recreation opportunities using the Recreation Opportunity Spectrum are conducted as part of Land and Resource Management Planning. The recreation input includes factors such as supply and demand, issues and identification of alternative responses to those issues, which the planner must assess in order to develop management area prescriptions designed to assure the appropriate recreation experience through setting and activity management on the Forest...

Land and Resource Management Planning assure that National Forest System lands provide a variety of appropriate opportunities for outdoor recreation... Each prescription should contain minimum guidelines and standards to be met as well as directions concerning the type of activities, settings, and experience opportunities to be managed for during the planning time periods... The land and water areas of the Forest are inventoried and mapped by Recreation Opportunity Spectrum class to identify which areas are currently providing what kinds of recreation opportunities. This is done by analyzing the physical, social, and managerial setting components for each area. The characteristics of each of these three components of the setting affect the kind of experience the recreationist most probably realizes from using the area.

- *PHYSICAL SETTING-The physical setting is defined by the absence or presence of human sights and sounds, size, and the amount of environmental modification caused by human activity.*
- *SIZE OF AREA-Size of area is used as an indicator of the opportunity to experience self-sufficiency as related to the sense of vastness of a relatively undeveloped area. In some settings, application of the remoteness criteria assures the existence of these experience opportunities; in other settings, the remoteness criteria alone do not. Therefore, apply the size criteria to the map or overlay developed using the remoteness criteria to insure that the appropriate experience opportunities are available. (Most useful for ROS setting inventory.)*
- *EVIDENCE OF HUMANS-evidence of Humans is used as an indicator of the opportunity to recreate in environmental settings having varying degrees of human influence or modification.*

- *SOCIAL SETTING*-The social setting reflects the amount and type of contact between individuals or groups. It indicates opportunities for solitude, for interactions with a few selected individuals, or for large group interactions.
- *MANAGERIAL SETTING*-The managerial setting reflects the amount and kind of restrictions placed on people's actions by the administering agency or private landowner which affect recreation opportunities." (1982 ROS User Guide, Forest Service)

The Forest Service Planning Handbook (FSH 1909.12 – Part 23.23a) addresses recreation resources. *"The Forest Plan must include desired conditions for sustainable recreation using mapped desired recreation opportunity spectrum classes. This mapping may be based on management areas, geographic areas, designated areas, independent overlay mapping, or any combination of these approaches. The plan should include specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired recreation opportunity spectrum classes."*

To meet the Planning Rule analysis requirements of using the *Best Available Scientific Information* and to ensure CEQ requirements for *Methodology and Scientific Accuracy*, ROS plan components with desired conditions, standards, and guidelines must be described in the plan. In addition, Primitive or Semi-Primitive Non-Motorized ROS class "Social Setting" guidance for party size and encounters would meet the NTSA comprehensive planning requirement for addressing carrying capacity in a Forest Plan. The following descriptions present plan components that link specific ROS characteristics to the appropriate ROS class.

Primitive ROS Setting

Primitive ROS Class Desired Conditions
Setting: The area is essentially an unmodified natural environment. Interaction between users is very low and evidence of other users is minimal.
Experience: Very high probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of woodsman and outdoor skill in an environment that offers a high degree of challenge and risk.
Evidence of Humans: Evidence of humans would be un-noticed by an observer wandering through the area. Natural ecological processes such as fire, insects, and disease exist. The area may provide for wildlife connectivity across landscapes. Primitive ROS settings contain no motorized and mechanized vehicles and there is little probability of seeing other groups. 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.
Primitive ROS Class Standards and Guidelines
Standards: (1) Motor vehicle use is not allowed unless necessary to protect public health and safety or the use is mandated by Federal law and regulation; and (2) Management actions must result in Very High Scenic Integrity.
Guidelines: (1) No new permanent structures should be constructed, since structures may degrade the unmodified character of these landscapes; (2) Less than 6 parties per day encountered on trails and less than 3 parties visible at campsite since an increase in the number of groups may lead to a sense of

crowding; (3) Party size limits range between 6 and 12; and (4) No roads, timber harvest, or mineral extraction are allowed in order to protect the remoteness and naturalness of the area.
Primitive ROS Class Suitability of Lands
Suitability: (1) Motorized and mechanized recreation travel are not suitable; and (2) lands are not suitable for timber production.

Semi-Primitive Non-Motorized ROS Setting

Semi-Primitive Non-Motorized ROS Class Desired Conditions
Setting: The area is predominantly a natural-appearing environment where natural ecological processes such as fire, insects, and disease exist. Interaction between users is low, but there is often evidence of other users.
Experience: High probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of woodsman and outdoor skill in an environment that offers a high degree of challenge and risk.
Evidence of Humans: Natural setting may have subtle modifications that would be noticed but not draw the attention of an observer wandering through the area. The area provides opportunities for exploration, challenge, and self-reliance. The area may contribute to wildlife connectivity corridors. Closed and re-vegetated roads may be present, but are managed to not dominate the landscape or detract from the naturalness of the area. Rustic structures such as signs and footbridges are occasionally present to direct use and/or protect the setting's natural and cultural resources.
Semi-Primitive Non-Motorized ROS Class Standards and Guidelines
Standards: (1) Motor vehicle use is not allowed unless necessary to protect public health and safety or the use is mandated by Federal law and regulation; and (2) Management actions must result in High or Very High Scenic Integrity level; and (3) No new roads may be built.
Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPMN settings; (2) Less than 15 parties per day encountered on trails and less than 6 parties visible at campsite, since an increased in the number of groups may lead to a sense of crowding; (3) Party size limits range between 12 and 18; and (4) Roads may not be constructed.
Semi-Primitive Non-Motorized ROS Class Suitability of Lands
Suitability: (1) Motorized recreation travel is not suitable; and (2) Lands are not suitable for timber production.

Semi-Primitive Motorized ROS Setting

Semi-Primitive Motorized ROS Class Desired Conditions
Setting: The area is predominantly natural-appearing environment. Concentration of users is low, but there is often evidence of other users.
Experience: Moderate probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of woodsman and outdoor skill in an environment that offers a high degree of challenge and risk. Opportunity to have a high degree of interaction with the natural environment. Opportunity to use motorized equipment.
Evidence of Humans: Natural setting may have moderately alterations, but would not draw the attention of motorized observers on trails and primitive roads within the area. The area provides for

motorized recreation opportunities in backcountry settings. Vegetation management does not dominate the landscape or detract from the experience of visitors. Visitors challenge themselves as they explore rugged landscapes.
Semi-Primitive Motorized ROS Class Standards and Guidelines
Standards: (1) Management actions must result in at least a Moderate Scenic Integrity level, and (2) Any road that is constructed or reconstructed for a vegetation manage project must be decommissioned within 2 years after the project is complete.
Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPM settings; (2) Low to moderate contact between parties to protect the social setting, and (3) Roads may not be constructed.
Semi-Primitive Motorized ROS Class Suitability of Lands
Suitability: Lands are not suitable for timber production.

Roaded Natural ROS Setting

Roaded Natural ROS Class Desired Conditions
Setting: The area is predominantly natural-appearing environments with moderate evidences of the sights and sounds of human activities. Such evidences usually harmonize with the natural environment Interaction between users may be low to moderate, but with evidence of other users prevalent. Resource modification and utilization practices evident, but harmonize with the natural environment. Conventional motorized use is provided for in construction standards and design of facilities.
Experience: About equal probability to experience affiliation with other user groups and for isolation from sights and sound of humans. Opportunity to have a high degree of interaction with the natural environment. Challenge and risk opportunities associated with a more primitive type of recreation are not very important. Practice and testing of outdoor skills might be important. Opportunities for both motorized and non-motorized forms of recreation are possible.
Evidence of Humans: Natural settings may have modifications, which range from being easily noticed to strongly dominant to observers within the area. However, from sensitive travel routes and use areas these alternations would remain unnoticed or visually subordinate. 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.
The Roaded Modified subclass includes areas that exhibit evidence of extensive forest management activities that are dominant on the landscape, including having high road densities, heavily logged areas, highly visible mining, oil and gas, wind energy, or other similar uses and activities.
Roaded Natural ROS Class Standards and Guidelines
Standard: Management actions must result in at least a Low Scenic Integrity level.

Roaded Natural ROS Class Suitability of Lands
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Suitability: Lands may be suitable for timber production.

Rural ROS Setting

Rural ROS Class Desired Conditions
Setting: Area is characterized by substantially modified natural environment. Resource modification and utilization practices are to enhance specific recreation activities and to maintain vegetative cover and soil. Sights and sounds of humans are readily evident, and the interaction between users is often moderate to high. A considerable number of facilities are designed for use by a large number of people. Facilities are often provided for special activities. Moderate densities are provided far away from developed sites. Facilities for intensified motorized use and parking are available.
Experience: Probability for experiencing affiliation with individuals and groups is prevalent as is the convenience of sites and opportunities. These factors are generally more important than the setting of the physical environment. Opportunities for wildland challenges, risk-taking, and testing of outdoor skills are generally unimportant except for specific activities like downhill skiing, for which challenge and risk-taking are important elements.
Evidence of Humans: Natural setting is culturally modified to the point that it is dominant to the sensitive travel route observer. May include intensively managed wildland resource landscapes. Pedestrian or other slow moving observers are constantly within view of the culturally changed landscape.
Rural ROS Class Suitability of Lands
Suitability: Lands may be suitable for timber production.

Draft Plan: The Draft Forest Plan recreation standard on page 126 describes that, “*FW-REC-G. All project-level decisions and implementation activities should be moving toward the desired ROS mapped classes and setting descriptions to sustain recreation settings and opportunities.*”

Comments: The CDNST corridor for existing and high-potential route segments must be clearly described and indicate desired ROS Primitive or Semi-Primitive Non-Motorized settings.

Designated Areas

Draft Plan: The Draft Forest Plan discusses designated areas beginning on page 161 saying that, “*Designated areas are not only managed to forest standards, but also must be managed to additional standards contingent as part of their designation. Depending on the type of designation, these areas may be managed primarily for human recreation interests, to provide for unhindered ecosystem processes with only low-technology recreation, or managed for the long-term unfolding of ecological changes, providing a critical education benefit as system baselines... Overall, designated areas can contribute to the cumulative value of the various ecosystem services the Santa Fe NF provides. Designated areas contribute to cultural ecosystem services by providing recreation opportunities and connecting people to their natural and cultural heritage. They can be attractions for visitors, and as a result, provide supporting ecosystem services through economic benefits such as increased employment opportunities and supporting small businesses to surrounding communities. Undeveloped areas with*

protections associated with their designation provide important supporting and regulatory ecosystem services for conservation of habitats and connectivity, biodiversity, and climate change adaptation. Finally, designated areas provide regulating ecosystem services by preserving intact natural systems and their individual components... The designated areas within the Santa Fe NF include: One national scenic trail (figure 5, page 182)."

Comment: I appreciate reading this brief overview of designated areas. Note that figure 5 does not accurately depict the location of the CDNST. A better displayed of the CDNST management corridor is provided on the map in **Appendix A**.

National Scenic Trail

Draft Plan: The Draft Plan beginning on page 183 describes that the *"According to the original 1976 Study Report, "the basic goal of the trail is to provide the hiker and rider an entree to the diverse country along the Continental Divide in a manner, which will assure a high quality recreation experience while maintaining a constant respect for the natural environment." These traditional uses persist, joined by a growing diversity of modern recreation. The CDNST is managed cooperatively among agencies and multiple partners, following the 2009 amended Comprehensive Plan. The Forest Service's Region 2 has the administrative lead overall, while in New Mexico, the BLM maintains public information online... Ecosystem services unique to the CDNST include cultural services such as providing for outdoor recreation and connection with the diverse cultural and natural landscapes existing along the spine of the Rocky Mountains. Cultural ecosystem services, as well as provisioning services like natural resources, are also supported under the purpose of the CDNST: "...to conserve natural, historic, and cultural resources along the CDNST corridor."* Note that footnotes i, ii, and iv online links need to be updated. Footnote iii should be deleted.

Comment: Plan components that protect CDNST values need to be associated with national trail management corridor. FSH 1909.12 24.43(2) describe that, *"The plan: ... (f) May, to apply plan components unique to the National and Scenic Historic Trail: provide one or more management or geographic areas for a national scenic and historic trail; reference the identified national scenic and historic trail right-of-way, place a corridor around the trail, or use other means to clearly identify where the plan components apply in reference to the trail."* This direction is ambiguous. Fortunately, for the CDNST, the planning directives describe that, *"FSM 2350 has more information about national scenic and historic trails."* FSM 2353.44(b)(1) requires that a Management Area be established for the CDNST.

Forest Plan CDNST Management Area (MA) direction must describe desired conditions, standards, guidelines, and suitability that provide for the nature and purposes of the CDNST. The nature and purposes of the CDNST should recognize hiker and equestrian activities as the primary recreational use as intended by the National Trails System Act (NTSA). The extent of the Management Area may reflect the unique qualities of the linear landscape of the area along the National Trail travel route. National Scenic Trails are so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of

the areas through which such trails may pass (NTSA Section 3(a)(2)) and significant natural, historical, and cultural resources are to be preserved (NTSA Section 5(f)). Protection of scenic landscapes and unique wildlife habitat may warrant establishing a corridor of a greater breadth than that normally provided by a Semi-Primitive Non-Motorized ROS setting.

Management activities and uses within the CDNST MA need to be compatible with the nature and purposes as described in the CDNST Comprehensive Plan and policy (FSM 2353.11, FSM 2353.42, FSM 2353.44, and FSH 1909.12 part 24.4). The National Trails System Act, Congressional Record, E.O. 13195, and 74 FR 51116 supports the nature and purposes of the CDNST as providing for high-quality, scenic, primitive hiking and horseback riding experiences and to conserve natural, historic, and cultural resources along the corridor. The compatibility of “modern recreation” uses and activities should be addressed when developing a CDNST unit plan for the forest (FSM 2353.44(b)(2)).

Providing for the protection of the nature and purposes of this National Scenic Trail requires that a CDNST MA be established along existing and high-potential route segments with a corridor extent of at least one mile. Recommendations for CDNST plan components, as applied to a Management Area that is associated with existing and high potential CDNST route segments, are described in the following table.

Descriptions
CDNST Management Area Desired Conditions
The CDNST corridor provides for high-quality scenic, primitive hiking and horseback riding opportunities and conserves natural, historic, and cultural resources along the corridor (CDNST nature and purposes).
The area is predominantly a natural-appearing or naturally evolving landscape. Scenic integrity objectives are High and Very High.
Interaction between users is very low and evidence of other users is minimal. Semi-Primitive Non-Motorized or Primitive ROS class settings are protected or restored.
The management area provides for natural ecological processes where the composition, structure, functions, and connectivity operates normally.
The CDNST linear landscape provides connectivity for people and wildlife.
CDNST LMP MA Objectives
For the purpose of addressing the National Trail System Act comprehensive planning site-specific planning requirements, a CDNST unit plan should be completed within five years. ³
CDNST Management Area Standards and Guidelines
Scenery Management
Standard: Manage the CDNST travel route as a concern level 1 travel route. To provide for desired Scenic Character, management actions must meet a Scenic Integrity Level of Very High or High in the immediate foreground and foreground visual zones as viewed from the CDNST travel route.
Recreation Setting Management

³ This stage of stepped-down planning could be addressed in a Forest Plan if supported by the Forest Plan EIS.

Standard: Resource management actions and allowed uses must be compatible with maintaining or restoring Primitive or Semi-Primitive Non-Motorized ROS class settings. Accepted Semi-Primitive Non-Motorized ROS class inconsistencies include existing: (1) NFS roads, (2) state and county road right-of-ways, and (3) utility right-of-ways. Manage ROS class inconsistencies with the objective of minimizing effects on the CDNST nature and purposes.
Standard: The CDNST must be managed to provide high-quality scenic, primitive hiking and pack and saddle stock opportunities. Backpacking, nature walking, day hiking, horseback riding, nature photography, mountain climbing, cross-country skiing, and snowshoeing are compatible with the nature and purposes of the CDNST. Forms of hiking include backpacking, cross-country skiing, snowshoeing and other similar walking activities.
Motor Vehicle Use by the General Public
Standard: Motor vehicle use by the general public is prohibited on the CDNST travel route unless that use: <ul style="list-style-type: none"> ▪ Is necessary to meet emergencies; ▪ Is necessary to enable adjacent landowners or those with valid outstanding rights to have reasonable access to their lands or rights; ▪ Is for the purpose of allowing private landowners who have agreed to include their lands in the CDNST by cooperative agreement to use or cross those lands or adjacent lands from time to time in accordance with Forest Service regulations; or ▪ Is on a motor vehicle route that crosses the CDNST, as long as that use will not substantially interfere with the nature and purposes of the CDNST, ▪ Is designated in accordance with 36 CFR Part 212, Subpart B, on National Forest System lands and: <ul style="list-style-type: none"> ○ The vehicle class and width were allowed on that segment of the CDNST prior to November 10, 1978, and the use will not substantially interfere with the nature and purposes of the CDNST or ○ That segment of the CDNST was constructed as a road prior to November 10, 1978; or ▪ In the case of over-snow vehicles, is allowed in accordance with 36 CFR Part 212, Subpart C, on National Forest System lands and the use will not substantially interfere with the nature and purposes of the CDNST.
Special Uses Management
Standard: Activities, uses, and events that would require a permit must not be authorized unless the activity, use, or event contributes to achieving the nature and purposes of the CDNST.
Minerals Management
Standard: Mineral leases are to include stipulations for no surface occupancy.
Standard: Permits for the removal of mineral materials are not to be issued.
Vegetation Management
Standard: Rangelands where affected by livestock use must be maintained in a Proper Functioning Condition.
Standard: Timber harvests may only be used for maintaining or making progress toward the Management Area desired conditions.
Guideline: Vegetation may be managed to enhance CDNST nature and purposes values, such as to provide vistas to view surrounding landscapes and to conserve natural resources. The purpose of this guidance is to allow for limited vegetation management for CDNST purposes.
Guideline: Vegetation may be managed to maintain or improve threatened and endangered species, proposed and candidate species, and species of conservation concern habitat. The purpose of this guidance is to recognize the conservation purposes of the CDNST.

Lands Acquisition
Standard: Provide for land acquisitions to protect the nature and purposes of the National Trail. Prohibit land disposals.
Travel Routes
Standard: The CDNST travel route may not be used for a livestock driveway.
Fire Suppression
Guideline: Fire suppression activities should apply the Minimum Impact Suppression Tactics Implementation Guidelines. The purpose of this guidance is to protect the CDNST nature and purposes from suppression activities.
Other Uses Considerations
Standard: To protect the values for which the CDNST was designated, resource uses and activities 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.
Guideline: Where congressionally designated areas overlap, apply the management direction that best protects the values for which each designated area was established—the most restrictive measures control. The purpose of this guidance is to protect the values for which all congressionally designated areas are established.
Suitability of Lands
Lands are not suitable for timber production. ⁴

Draft Plan: The Draft Plan presents CDNST plan components beginning on page 184.

Comments: Plan component concerns were discussed in scoping comments that were submitted on August 14, 2016. The Draft Plan continues to present CDNST plan components that do not reflect nature and purposes of the CDNST. The following are brief discussions that address some of the issues with the Draft Forest Plan CDNST plan components.

- ~~The CDNST is a well-defined trail in a highly scenic setting that provides for high-quality primitive hiking and horseback riding opportunities, and other compatible non-motorized trail activities. Significant scenic, natural, historic, and cultural resources along the CDNST's corridor are conserved.~~{There are elements of this description that do not align with the Comprehensive Plan. I recommend retaining the nature and purposes language that is found in the Comprehensive Plan.}
- ~~Front-country and easily accessible trail segments complement local community interests and needs and help contribute to their sense of place.~~{This conflicts with the nature and purposes of the CDNST.}

CDNST standards components include:

⁴ Timber production does not contribute to protecting and enhancing the nature and purposes of the CDNST. Any timber management activities on federal lands within the CDNST rights-of-way/management area must only be done for the protection and enhancement of the values for which this National Scenic Trail was designated.

- ~~Management of the Continental Divide National Scenic Trail shall comply with the most recent version of the Continental Divide National Scenic Trail Comprehensive Plan. Best available science can be used in lieu of the comprehensive plan if plan is more than 15 years old. {This is inconsistent NFMA and NEPA planning requirements and must be deleted.}~~
- Motorized use shall not be allowed on newly constructed segments of the Continental Divide National Scenic Trail. ~~Existing motorized use may continue on the Continental Divide National Scenic Trail (where it overlaps with existing roads and motorized trails).~~ {This direction is not consistent with the NTSA as implemented through the Comprehensive Plan and policy.}

CDNST guidelines components include:

- ~~The corridor around the CDNST should be defined by either the foreground (0.5 mile on either side) or based on the Scenery Management System viewshed, which shows the landscape area visible from the trail based on topography. {This direction is not relevant. The corridor that protects CDNST values is required through revision processes.}~~
- To retain or promote the character for which the CDNST was designated, the corridor should be consistent with primitive or semi-primitive non-motorized ROS classes.
 - ~~a) The corridor may intermittently pass through more developed settings. {Instead, describe where ROS inconsistencies will allowed.}~~
 - b) ~~The CDNST provides for a continuous route through predominately undeveloped settings. {This should be a forest planning criteria for locating the CDNST.}~~
 - c) ~~New or relocated trail segments should be located primarily within these settings. {This a task for forest planning and not implementation.}~~
 - d) ~~Road and motorized trail crossings and other signs of modern development should be avoided. {This a task for forest planning and not implementation.}~~
- To protect or enhance the scenic qualities of the CDNST, management activities should be consistent with scenic integrity {level} objectives of high or very high ~~within the foreground of the trail (up to 0.5 mile either side).~~ {SIO should be a Desired Condition.}
- If management activities {that do not substantial interfere with the nature and purposes of the CDNST, but} result in short-term impacts to the scenic character along the Continental Divide National Scenic Trail, mitigation measures should be included (e.g., screening, feathering, and other scenery management techniques), to minimize visual impacts at key points (e.g., vistas), within 0.5 mile either side of the trail.
- To protect the CDNST's scenic values {and ROS setting}, new communication sites, utility corridors, and renewable energy sites developed under special-use authorizations should not be visually apparent within visible foreground (up to 0.5 mile) and should be visually subordinate in the middleground viewshed (up to 4 miles).
- ~~New temporary and permanent road or motorized trail construction across or adjacent to the Continental Divide National Scenic Trail should be avoided unless necessary for resource protection, access to private lands, or to protect public health and safety. {This direction would be better addressed through establishing ROS settings and through public motorized use that is allowed by the NTSA.}~~

- ~~Except where the CDNST follows a road, the trail should not be used for landings (e.g., timber, slash, decking) or as a temporary road. Hauling or skidding along the trail itself should be allowed only when design features are used to minimize impacts to the trail infrastructure and:~~
 - ~~a) where the CDNST is currently located on an open road, and~~
 - ~~b) no other haul route or skid trail options are available.~~

{There are many issues with this guidance. In short, the CDNST is not be located on road where timber haul is allowed. In these cases, the revised plan is to identify and protect a high potential route segments to resolve the issue. Locating the CDNST route to the high-potential segment should be a plan objective.}

- ~~Uses that could conflict with the nature and purpose of the CDNST should be prohibited when it is determined that the use would interfere with the nature and purpose of the trail.~~ {Uses are prohibited when the use will substantially interfere with the nature and purposes the CDNST.

Meeting Desired Conditions and Objectives Monitoring

Forest Plans and Resource Management Plans must monitor progress toward meeting desired conditions and objectives for National Scenic Trails. Specific to the Forest Service – Has plan components provided for desired natural-appearing or naturally evolving landscapes? Indicator: Acres meeting the high or very high scenic integrity levels. Are the current recreation settings providing for or moving toward desired ROS classes? Indicator: ROS indicators consistency with desired ROS class. Have natural ecological processes persisted or been restored? Indicator: Acres of fires managed for resource objectives within the CDNST corridor. Is the CDNST travel route maintained to standard? Indicator: Miles of trails maintained annually. Has a CDNST unit plan been prepared and approved? Indicator: CDNST unit plan scoping, draft, and final. Has the effects from any uses or activities been as predicted that were allowed due to a not likely to substantially interfere with the nature and purposes determination (NTSA, Section 7(c))? Indicator: Monitoring plan as described in the other uses or activities approving decision document.

Draft Environmental Impact Statement

Purpose and Need for Action – Multiple Uses

DEIS Volume 1: *The DEIS describes that, “The qualities that led to the designation of wilderness and wild and scenic rivers contribute to the social sustainability by connecting people to their natural and cultural heritage and providing recreational opportunities. These areas also contribute to ecological sustainability by preserving intact natural systems and their individual components. There is a need for plan direction to identify and evaluate potential additions to the National Wilderness Preservation System and eligibility for inclusion in the National Wild and Scenic Rivers System. In addition, plan direction for designated and recommended wilderness areas is needed to protect and enhance wilderness values and character.”*

Comment: The DEIS fails to address the need to (1) described the rights-of-way for the CDNST that encompasses existing and high-potential route segments, and (2) to established components that

provide for the nature and purposes of the CDNST. The limited purpose and need statement has inappropriately limited reasonable alternatives that should have been addressed in the DEIS. An approach to improve the analysis and eventual decision is to prepare a revised Draft Plan and Supplemental DEIS.

Affected Environment - Recreation Opportunity Spectrum

DEIS Volume 1: The description of Affected Environment, beginning on page 403 describes that, *“Recreation opportunities are key indicators of how each alternative would affect management of the recreation program. The desired Recreation Opportunity Spectrum (ROS) has been used to map the Santa Fe NF by the most applicable types of recreation opportunities desired for an area. The ROS is a continuum used for managing recreation opportunities based on a combination of physical, biological, social, and managerial settings, ranging from primeval to paved (Clark and Stankey, 1979)... The managerial setting is distinguished by the amount and kind of restrictions placed on people’s actions by the respective administering agency or private landowner (USDA Forest Service 1986)... The ROS scale encompasses recreation opportunities ranging from less to more developed settings. The ROS uses the following descriptors for recreation settings ranging from least to most developed....”*

Comment: The purpose of the Affect Environment is not to describe the, *“most applicable types of recreation opportunities desired for an area.”* ROS represents opportunities and not objectives.

The description should describe that the ROS framework is divided into six major classes (Urban, Rural, Roaded Modified/Roaded Natural, Semi-Primitive Non-Motorized, Semi-primitive Motorized, and Primitive) with each class having seven setting indicators (access, remoteness, naturalness, facilities, social encounters, visitor impacts, and visitor management). Setting and indicators need to be defined in the Plan and FEIS.

Affected Environment – Scenic Resources

DEIS Volume 1: The description of Affected Environment, on page 452 describes that, *“The Continental Divide National Scenic Trail is intended to provide for scenic, high quality, primitive hiking and horseback riding experiences, while preserving the significant natural, historic and cultural resources along the Trail... Management of multiple resources has, to varying degrees, altered the natural scenic character of the Santa Fe NF. The most obvious effects on scenic resources are from vegetation and landform alterations. Resource management activities that have altered scenic resources include vegetation management, mineral extraction, utility installation, road and trail construction and maintenance, developed recreation site construction, fire management (suppression and prescribed burning), overly dense vegetation resulting from fire suppression, and livestock grazing.”*

Comment: The DEIS should have addressed the CDNST corridor that includes existing and high potential route segments. What is the scenery inventory along the CDNST? Scenic integrity is defined as the degree of direct human-caused deviation in the landscape, such as road construction, timber harvesting, or activity debris. Indirect deviations, such as a landscape created by human suppression of the natural role of fire, are not included.

Affected Environment – Continental Divide National Scenic Trail

DEIS Volume 2: The description of Affected Environment, on page 95 states that, *“Designated by an Act of Congress in 1978, the Continental Divide National Scenic Trail (CDNST) traverses 3,100 miles from Mexico to Canada. Within the Santa Fe NF, the CDNST includes approximately 40.4 miles on the Coyote and Cuba Ranger Districts. In 2005, the Santa Fe NF, Cuba Ranger District, and the Department of Interior Bureau of Land Management (BLM), Rio Puerco Field Office, initiated a joint planning effort for relocating a section of the CDNST to ensure consistency with the original vision of the trail. Currently, building a CDNST re-route south of San Pedro Parks Wilderness is in progress.”*

Comment: A Supplemental DEIS must 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 the CDNST. Further guidance is found in the attached CDNST Planning Handbook in Chapter IV part D.

Environmental Consequences – Methodology and Analysis Process for National Trails

General Comment: In general, the Forest Service has failed to establish ROS desired conditions, standards, and guidelines to protect the nature and purposes of the CDNST. Comprehensive planning for the CDNST, as implemented through Santa Fe National Forest.42 policy staged decision making processes, is inconsistent with the NTSA, Section 5(f) and 7(c) direction as implemented through the CDNST Comprehensive Plan, E.O. 13195, and directives. The Forest Service has failed to protect the purposes for which the CDNST was established by Congress.

The introductory comments should include the assumptions found in the Landscape Aesthetics Handbook. “Scenic Integrity indicates the degree of intactness and wholeness of the Landscape Character; conversely, Scenic Integrity is a measure of the degree of visible disruption of the Landscape Character. A landscape with very minimal visual disruption is considered to have very high Scenic Integrity. Those landscapes having increasingly discordant relationships among scenic attributes are viewed as having diminished Scenic Integrity. Scenic Integrity is expressed and mapped in terms of Scenic Integrity levels: Very High, High, Moderate, Low, Very Low, and Unacceptably Low. Scenic Integrity is used to describe an existing landscape condition, a standard for management, or a desired future condition... Scenic integrity is defined as the degree of direct human-caused deviation in the landscape, such as road construction, timber harvesting, or activity debris. Indirect deviations, such as a landscape created by human suppression of the natural role of fire, are not included... Integrity could also be used to define the wholeness or condition of the ecosystem but it is assumed that will take place as part of the overall integrated ecosystem management process. However, a landscape character goal of high scenic integrity should also be one of high ecosystem integrity. One does not necessarily ensure the other... HIGH scenic integrity refers to landscapes where the valued landscape character "appears" intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.” A Supplement DEIS should address the interrelationship between providing for a high scenic integrity level and high ecosystem integrity allowing for public input on a proposed approach to address the two possibly conflicting goals.

DEIS Volume 2: The description of Environmental Consequences, on page 97, describes that, “*ROS classes may vary considerably depending on the alignment of the trail and its proximity to roads. However, trails are primarily non-motorized and most often classified as Semi-Primitive Non-Motorized or Primitive.*”

Comment: ROS desired conditions of Primitive and Semi-Primitive Non-Motorized setting should manage existing roads as ROS class inconsistencies to minimize the effects on the purposes for which the area was established.

DEIS: The description of Environmental Consequences, beginning on page 98, describes that, “*The comprehensive plans for the CDNST and national historic trails would guide management for these trails under all alternatives. Establishment reports for NRTs would continue to guide management under all alternatives. The current nationally-designated trails would continue to be managed to protect the values for which they were designated and provide opportunities to view natural features and scenery, recreational opportunities in a variety of ROS settings, and public use and enjoyment of historic routes and associated historic remnants resulting in opportunities for the public to connect with nature and enjoy the nature and purposes for which the trails were designated... Alternatives 2, 3, and 4 include specific plan components for each type of trail designation to align with the nature and purpose of the trail. Designated area plan components include comprehensive direction for: Continental Divide National Scenic Trail, national historic trails, and national recreation trails. Desired conditions, objectives, standards and guidelines align management direction with the nature and purpose of each trail and any applicable comprehensive plans...*”

Comment: The DEIS does not address the expected effects of each alternative on CDNST nature and purposes values as measured through the ROS planning framework. The FEIS does not describe the effects on timber production, vegetation management, range management, recreation management, wildlife management, wilderness, recommended wilderness, and fire management on the CDNST nature and purposes values.

The EIS must disclose effects of the proposed action and alternatives on scenic integrity, ROS class conditions, and carrying capacities. Utilizing the 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 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.

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. A Supplemental DEIS effects analysis must 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 desired

conditionscontra, including providing for the nature and purposes of the National Trail, including protecting the National Trail resources, qualities, values, and associated settings.

Further guidance is found in the attached CDNST Planning Handbook in Chapter IV part E.

Timber Suitability Analysis

DEIS Volume 2: The DEIS on page 239 states that, *“Of the designated areas with management specified by the laws associated with their enactment, the Jemez National Recreation Area, National Scenic Trails, and National Historic Trails areas are not removed from lands that may be suited for timber production because sustainable timber harvest is not inconsistent with the law, regulation, policy, or plan direction that directs management of these lands. For these areas, site specific analyses during project planning will determine the appropriate timber harvest prescriptions to maintain desired conditions for these areas.”*

Comment: The declaration is not factual that, *“Other designated areas with management specified by the laws associated with their enactment including, national recreational trails, national scenic trails, and national historic trails were not removed from lands that may be suitable for timber production because sustainable timber harvest is not inconsistent with the law, regulation, policy, or plan direction that directs management of these lands”* and must be discarded.

Continental Divide National Scenic Trail: Timber production is incompatible with achieving National Trails System Act objectives and the CDNST nature and purposes desired conditions. The purpose of timber production is the purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, or other round sections for industrial or consumer use, which is in stark contrast and clearly incompatible with protecting the purposes for which National Trails are established. The CDNST rights-of-way/management corridor is not suitable for timber production (36 CFR 219.11(a)(i) and (iii)).

The NTSA, Section 2(a), policy describes an objective as, *“...to promote the preservation of, public access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Nation....”* Section 3(a)(2), states that, *“national scenic trails...will be...located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.”* Section 5(f), describes that a comprehensive plan, which is being completed through staged decision making on NFS lands, will provide management direction that addresses, *“specific objectives and practices to be observed in the management of the trail, including the identification of all significant natural, historical, and cultural resources to be preserved..., and a protection plan for any...high potential route segments.”* Section 7(c) restricts uses and activities, including the removal of vegetation describing that, *“Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted.”*

The CDNST Comprehensive Plan and FSM 2353.42 policy describes desired conditions, *“Administer National Scenic and National Historic Trail corridors to be compatible with the nature and purposes of*

the corresponding trail... The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor.”

The lasting effects of an activity (roads, timber harvest) as well as short-term effects (logging trucks, noise) degrade CDNST values. Managing the CDNST corridor for Roded Natural/Modified and Semi-Primitive Motorized ROS settings and timber production purposes would lead to management actions that substantially interfere with the nature and purposes of the CDNST. In areas of timber production, reoccurring harvests for timber purposes, stand tending, road construction and reconstruction, CDNST travel route closures, and other activities are incompatible with desired ROS settings and Scenic Integrity Objectives.

The Plan should recognize that timber production and associated actions and activities are inconsistent with the provisions of (1) the National Trails System Act, including providing for the nature and purposes of the CDNST and (2) Primitive and Semi-Primitive Non-Motorized ROS classes, which are appropriate ROS allocations for a CDNST management corridor or rights-of-way. Regulated forest structure conditions maintained by periodic forest harvest and regeneration is inconsistent with and unnecessary for achieving CDNST, Primitive ROS class, and Semi-Primitive ROS class desired conditions; these areas must not be classified as suitable for timber production, and harvest quantity projections must not be included in projected wood sale quantity and projected timber sale quantity calculations.

Eligible Wild and Scenic Rivers: The Wild and Scenic Rivers Act protects the vestiges of primitive America along Wild River areas, shorelines or watersheds still largely primitive and shorelines largely undeveloped along Scenic River Areas, and there may be some development along the shorelines of Recreational River Segments. Regardless of classification, each river in the National System is administered with the goal of protecting and enhancing the values that caused it to be designated.

Timber production does not protect ORVs of Scenic and Recreational Rivers. The only timber harvest to occur along eligible Scenic and Recreational Rivers is for resource benefit. A range of vegetation management and timber harvest practices may be allowed along Scenic River areas and Recreational River areas, if these practices are designed to protect users, or protect, restore, or enhance the river environment, including the long-term scenic character. Eligible Scenic Rivers and Recreational Rivers are not suitable for timber production (36 CFR 219.11(a)(i) and (iii)).

Recommendations – Revised Draft Plan and Supplemental DEIS

The draft plan should be revised to provide for the integrated management of congressionally designated areas and to clarify and strengthen the direction presented. National Scenic and Historic Trails must be managed in accordance with the National Trails System Act of 1968, as amended. The CDNST must be protected to provide for the nature and purposes of this National Scenic Trail. Primitive and Semi-Primitive Non-Motorized ROS settings normally provide for the nature and purposes of the CDNST. Semi-Primitive Motorized and Roded Natural ROS allocations do not protect CDNST values; however, the CDNST Comprehensive Plan recognizes that crossing State Highways and other similar permanent developments is unavoidable. National Scenic Trails may contain campsites, shelters, and related-public-use facilities. 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.

The extent of the established CDNST Management Area must also be based on compatible Recreation Opportunity Spectrum allocations along the CDNST travel route. If the proposed plan components are not modified to reflect a desirable Primitive or Semi-Primitive Non-Motorized ROS setting along the CDNST than an alternative should be developed to protect the CDNST setting. This ROS assessment and recommendation is based in part on recreation research and handbooks including information found in (1) The Recreation Opportunity Spectrum: A Framework for Planning, Management, and Research, General Technical Report PNW-98 by Roger Clark and George Stankey; (2) ROS Users Guide (U.S. Department of Agriculture, Forest Service. ROS Users Guide. Washington, DC: U.S. Department of Agriculture, Forest Service; 1982 (FSM 2311.1); (3) Recreation Opportunity Setting as a Management Tool Technical Guide by Warren Bacon, George Stankey, and Greg Warren (**Attachment C**); and (4) Landscape Aesthetics, A Handbook for Scenery Management, Agricultural Handbook Number 701.

The glossary of the Forest Plans and EIS should be consistent and expanded to include description or definitions of the National Trails System Act, National Scenic Trail, National Scenic and Historic Trail nature and purposes, and Scenic Integrity. Recreation Opportunity Spectrum class definitions need to be expanded to add descriptions of Access, Remoteness, Non-Recreation Uses, Visitor Management, Social Encounters, and Visitor Impacts setting indicators. The Forest Plan glossary should include other descriptors for clarity and recommend adding those definitions and terms that are found in the attached CDNST Planning Handbook.

A revised Draft Plan must address the requirements of the National Trails System Act as implemented through the 2009 CDNST Comprehensive Plan, FSM 2353.4, FSH 1909.12 22.2 and 24.43, and direction in Federal Register Notice dated October 5, 2009 (74 FR 51116). In addition, the Draft Plan does not address the requirements of FSH 1909.12 22.2, 23.23a, and 23.23f. This inaction has resulted in a Draft Plan that does not meet the integration requirements of the National Forest Management Act (16 U.S.C. 1604(f)(1)).

A Supplemental DEIS must address several important planning steps and NEPA processes. The Forest Supervisor should correct the DEIS deficiencies and release a revised Draft Plan and Supplemental DEIS to further address the requirements of the National Trails System Act, NFMA, and NEPA CEQ regulations as found in 40 CFR Parts 1500-1508. Land use planning associated NEPA must (1) rigorously explore and objectively evaluate all reasonable alternatives, and (2) take a hard look at the effects of the alternatives.

Geospatial data was requested following FOIA procedures on September 8, 2019, which is yet to be received. *“Under the Freedom of Information Act, I am requesting geospatial data for the Carson, Santa Fe, and Cibola NFs Draft Plans and DEISs that support the analyses of the revision proposed action and alternatives for each national forest. I would appreciate receiving the following datasets:*

- *Administrative Boundaries (FSH 1909.12 part 22.2)*
- *Land Ownership (FSH 1909.12 part 22.2)*

- *Designated Areas, including Recommended Wilderness, Wilderness Study Areas, Suitable and Eligible Wild & Scenic Rivers, Inventoried Roadless Areas, and the extent of the CDNST management corridor/rights-of-way to be established (acres) (FSH 1909.12 parts 22.2 and 24)*
- *Recreation Opportunity Spectrum Classes to be established – Summer and Winter (FSH 1909.12 parts 22.2 and 23.23a)*
- *Scenic Integrity Objectives to be established (FSH 1909.12 parts 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 part 23.23I)*
- *NFS roads and trails with attribute data (FSH 1909.12 part 23.23I)*

If the above GIS data is posted on the Forest Service websites, please provide to me the web-link locations. If this data is not to be posted to the Forest Service website, please send to me an email with the data attached in a zip file with embedded shapefiles, or a personal geodatabase which is preferred.”

Unfortunately, these datasets were not available in a timely manner for my review of the Draft Plan and DEIS. As such, my comments are more general than what I was hoping to provide in this submittal. Please readily provide these geospatial datasets in future releases of the planning documents.

Thank you for considering these comments.

Greg Warren

Attachment A – CDNST Comprehensive Plan (as amended in 2009)

Attachment B – CDNST Planning Handbook

Attachment C – Recreation Opportunity Setting as a Management Tool Technical Guide

Appendix A – Location for the CDNST Management Area for existing and high potential route segments.

