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The following are comments regarding the Draft Revised Environmental Assessment for the South Plateau Landscape Area Treatment Project. The project is proposing to, *“increase forest resilience to insects and disease, treat hazardous fuels to increase the safety of first responders and the public in the event of wildland fire, and to contribute to a sustained yield of timber products.”*

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Purpose and Need - The purpose and need on page 3 states, *“Reduce the risk from and increase stand resistance and landscape resilience to insects and disease, particularly long-term losses of lodgepole pine stands... Contribute to a sustained yield of timber products and improve the productivity of forested timber stands... Treat hazardous fuels to increase fire suppression effectiveness and reduce risk to the public and first responders.”*

Comment – The purpose and need statement should include a discussion specific to how the project contributes to maintaining or restoring Semi-Primitive Motorized ROS settings and providing for the recreation and conservation purposes of the Continental Divide National Scenic Trail (CDNST).

The Purpose and Need for action should have recognized that there must be considerable constraints on mechanical vegetation treatments and on the construction of permanent and temporary roads in Semi-Primitive Recreation Opportunity Spectrum (ROS) settings if their more primitive characteristics are to be retained. To the extent practicable, actions should avoid activities incompatible with the purposes for which the CDNST was established. Actions that would substantially interfere with the nature and purposes of a National Scenic Trail are to be eliminated from detailed study in NEPA analyses.

Proposed Action – The proposed action beginning on page 5 states, *“Potential resource conflicts were considered and would be resolved by implementing management actions using the project’s Design Features (listed in Appendix B) as they limit the effects of proposed actions to comply with Plan standards and guidelines... The Forest Service proposes to implement forest resilience, timber harvest and fuels reduction treatment actions on up to 16,462 acres within the South Plateau project area [as depicted in Figure 2] ... Up to 56.8 miles of temporary project roads may be constructed to support project actions. Temporary project roads would not be a permanent part of the road system. Temporary roads would be constructed, used, then closed and obliterated as part of timber sale or stewardship contracts... The exact locations of temporary roads are not yet known, but placement would be consistent with Design Features....”*

Comment – There continues to be unresolved conflicts. The Environmental Assessment should recognize that mechanical treatment of vegetation and associated road building and activities are normally inconsistent with Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized ROS settings.

The described treatments design features and sideboards do not protect CDNST nature and purposes qualities and values. Design features do not mitigate impacts to the desired recreation setting and scenic character of the CDNST corridor. Implementation of the proposed action would substantially interfere with the nature and purposes of the CDNST which is not allowed by the National Trails System Act.

Proposed actions must be consistent with desired conditions, as well as standards and guidelines. The proposed action description should be expanded to described that in Semi-Primitive Motorized ROS settings, characteristics would be maintained or restored. In addition, Semi-Primitive Non-Motorized ROS class conditions should be maintained or restored within the CDNST management corridor of existing and potential route segments as depicted on the map in **Appendix A**.

Recreation Assessment – Recreation Effects beginning on page 41 states, *“Vegetation management activities could temporarily affect summer recreationists while activities are ongoing, including travelers on the Continental Divide National Scenic Trail, because they may experience the sights and sounds of vegetation management, and may choose to avoid areas where activities are ongoing...”*

The proposed project has the potential to negatively affect recreation resources. Vegetation management may result in visitors experiencing the sights and sounds of management and increased traffic with heavy equipment and logging trucks. As a result, recreationists may avoid the portions of the project area while activities are ongoing...

Vegetation management is expected to have a temporary negative affect on travelers on the Continental Divide Trail while treatments are occurring within the trail corridor because travelers are likely to experience the sights and sounds of management....”

Comment – To understand the effects of the proposed action, a discussion of the affected environment should be included in the assessment. I recommend that the ID Team succinctly describe the environment of the area to be affected or created by the alternatives under consideration.

The recreation opportunity spectrum provides a framework for integrating recreational opportunities and nonrecreational activities. The central notion of the spectrum is to offer recreationists alternative settings in which they can derive a variety of experiences. Because the management factors that give recreational value to a site are interdependent, management must strive to maintain consistency among these factors so that unplanned or undesired changes in the opportunities do not occur.

Primitive and Semi-Primitive ROS classes will constrain some management actions such as mechanical treatments of vegetation that utilize heavy equipment and permanent or temporary roads if these desired ROS class opportunities are to be protected. Since its inception, the recreation opportunity setting has been composed of other natural features in addition to the six factors. Landform types, vegetation, scenery, water, and wildlife are all important elements of recreation environments; they influence where people go and the kinds of activities possible.

The Recreation Specialist Report states, *“This project was not designed to attain this desired condition, but it does not foreclose the opportunity to maintain or achieve this component over the long term. The project area contains semi-primitive motorized (summer) settings; the proposed project activities are consistent with this setting where applicable as discussed in the Recreation Specialist Report”* (Thompson 2022). This finding is not warranted.

The 2022 Forest Plan establishment of Semi-Primitive Motorized settings being suitable for timber production is inconsistent with the ROS planning framework. The Forest Plan beginning on page 90 reviews recreation settings and recreation opportunity spectrum. ROS setting characteristics are described as:

- *Desired Condition 07 Semi-primitive motorized recreation opportunity spectrum settings (summer) provide motorized recreation opportunities in backcountry settings... Visitors challenge themselves as they explore vast, rugged landscapes... Vegetation management may be present, but does not dominate the landscape or detract from the experience of visitors traveling throughout the semi-primitive motorized setting.”*

The 2006 Forest Plan appropriately recognized a Road Modified ROS setting and adequately defines the following ROS class, which is consistent with the ROS planning framework:

- *ROADED MODIFIED. A distinct subclass of setting features exists within the Roaded Natural Class. This subclass occurs where human modification is locally dominant or codominant with a natural-appearing landscape, much like the rural setting. However, the recreation opportunities provided are significantly different from the Rural setting....”*

The Proposed Action, as depicted in Figure 2 of the Draft EA, will result in thousands of acres of Roaded Modified ROS class conditions, which is inconsistent with the Forest Plan desired conditions for the Semi-Primitive Motorized ROS setting and for providing for the nature and purposes of the CDNST. The proposed action is inconsistent with Semi-Primitive Motorized ROS settings direction that states, *“Vegetation management may be present, but does not dominate the landscape or detract from the experience of visitors traveling throughout the semi-primitive motorized setting”* (FW-DC-ROS-07).

Impacts are not temporary lasting for over 15 years. The described road design features and sideboards do not protect CDNST nature and purposes qualities and values and established recreation setting characteristics. Implementation of the proposed action would substantially interfere with the nature and purposes of the CDNST which is not allowed by the National Trails System Act. Furthermore, the proposed road building and regeneration harvests would result in ROS Roaded Modified settings, which is an effect that is not disclosed in the Environmental Assessment.

The Recreation Opportunity Spectrum is reviewed in the attached Planning Handbook – see Chapter III parts E, F, and K (**Attachment A**) and is incorporated in these comments by reference. In addition, ROS is reviewed in a Forest Plan Objection and are also incorporated in these comments by reference – see Forest Plan Objection Section II, Section III part B, Section IV part D, and Section V part B (**Attachment B**).

The preponderance of the vegetation within the project area is within the Natural Range of Variation which is consistent with the desired natural settings that are expected within Primitive and Semi-Primitive ROS settings. These settings should be managed to maintain their natural involving conditions. Vegetation management actions should minimize the construction or reconstruction of permanent and temporary roads in these ROS classes.

Scenery Assessment – Scenery effects beginning on page 43 states, *“The project area contains about thirteen miles of the Continental Divide National Scenic Trail. The CDNST corridor is assigned a scenic integrity objective of high in the trail’s visual foreground (0 to ½ mile) as shown in Figure 10. While work is ongoing, some elements of the proposed project actions would be visible to people on the trail. Elements may include cut stumps, slash piles, skid trails or temporary roads. Not all work in the foreground would be discernible to trail users due to blocking terrain or vegetation. Due to the project’s scenery design features, after five years of completion of all project activities, visual elements would not be discernible within the visual foreground by the average CDNST traveler and would be consistent with the high scenic integrity objective.*

After five years of completion of all project-related activities, travelers along the CDNST may recognize activities associated with the project in areas beyond the visual foreground (more distant than ½ mile). These areas are assigned integrity objectives of moderate and low; visual evidence of project activities would be consistent with moderate and low objectives.

No other reasonably foreseeable management actions are known that would have a cumulative effect on scenery on this portion of the CDNST because the Yellowstone Shortline Trail complies with assigned SIOs and no other projects are reasonably foreseeable or ongoing in the area.”

Comment – To understand the effects of the proposed action, a discussion of the affected environment should be included in the assessment. I recommend that the ID Team succinctly describe the environment of the area to be affected or created by the alternatives under consideration.

The Scenic Character (aka Landscape Character) description is used as a reference for the Scenic Integrity of all lands. 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 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 Very High, High, Moderate, Low, Very Low, and Unacceptably Low.

Natural scenic character originates from natural disturbances, succession of plants, or indirect activities of humans. The existing scenic character continues to change over time by natural processes unless affected by indirect human activities. In a natural-appearing landscape, the existing landscape character has resulted from both direct and indirect human activities. Scenic character may have changed gradually over decades or centuries by plant succession unless a concerted effort was made to preserve and maintain cultural elements through processes such as prescribed fires.

Scenic integrity is defined as the degree of direct human-caused deviation in the landscape, such as temporary and permanent roads, timber harvests, or activity debris. Indirect deviations, such as a landscape created by human suppression of the natural role of fire, are not included in scenic integrity evaluations. Natural occurring incidents, such as insects and disease infestations, are not defined as human-caused deviations in the landscape.

The Forest Plan reviews Scenery beginning on page 102. Scenic Integrity Objectives are described as:

High SIO - Landscapes in which the scenic character appears intact. Deviations from or disruptions to the scenic character resulting from management actions are not evident.

Moderate SIO - Landscapes in which the scenic character appears slightly altered. Noticeable deviations from or disruptions to the scenic character resulting from management actions are discernible but must remain visually subordinate to the scenic character.

The proposed action would result in not meeting SIO objectives throughout the planning period due to the allowance that SIO do not need to be met until *five years of completion of all project activities*. Design criteria should further limit the percentage of the established Semi-Primitive Motorized ROS settings that can be modified during the planning period, which would help limit visual effects.

Transportation Assessment – The transportation section on page 48 states, *“Three components of the proposed project have the potential to affect the transportation system: the use of Forest Service System roads for project activities, particularly timber hauling; the creation of temporary project roads; and the proposed permanent road changes.”*

Comment – Temporary roads have the same types of environmental impacts as system roads, although at times the impacts can be worse if the road persists on the landscape since they are not built to last. Although they are termed temporary roads, their impacts are not temporary often lasting for over 15 years. Roads may be temporary for the purpose of a specific vegetation or resource development project, but these routes often have long-term negative impacts to other resource values. Where access to a specific area (e.g., timber stand) is needed for long-term resource management, a temporary road should never be constructed as a substitute for a classified road.

Successful restoration of any road entails many steps. It requires ripping up the road bed to remove the compacted soil layers. The side slope soil must be put back on the site, and reshaped so sub surface and

surface water flow are restored. Culverts need to be removed, and stream channels fully restructured and reconstituted. Native vegetation often needs to be planted. Long-term monitoring of restoration actions is critical to ensure that desired site conditions are achieved and sustained.

Transportation information is important to several programs and resources including timber, wildlife, watershed, soil, recreation, and National Trails. The EA does not take a hard look at the effects of the transportation system on several important resources and special areas. The effects of the proposed permanent and temporary roads need to be thoroughly disclosed in the EA.

Continental Divide National Scenic Trail – The draft EA does not address CDNST nature and purposes qualities and values.

Comment – To understand the effects of the proposed action, a discussion of the CDNST affected environment should be included in the assessment. I recommend that the ID Team succinctly describe the environment of the CDNST corridor area to be affected or created by the alternatives under consideration.

The affected environment section should describe the degree to which CDNST qualities and values are being protected, including the protection of desired recreation settings, scenic integrity, and providing for the conservation purposes along the existing CDNST travel route and high-potential route segments (16 U.S.C. § 1244(f)(3)). Furthermore, the quality or condition of the ecological characteristics of the National Scenic Trail management corridor should be described.

Providing for the nature and purposes of the CDNST normally includes providing for Primitive or Semi-Primitive Non-Motorized ROS settings (ROS class descriptions that are consistent with ROS settings as described in the 1986 ROS Book) and Scenic Character that is Naturally Evolving or Natural-Appearing with a Scenic Integrity Objective of Very High or High. Each action alternative must provide for the nature and purposes of this National Scenic Trail, including protecting the National Trail resources, qualities, values, and associated settings.

The Forest Plan beginning on page 175 reviews plan components for the CDNST and states, *“The 2009 Comprehensive plan provides this statement “The nature and purposes of the Continental Divide National Scenic Trail ... to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the Continental Divide National Scenic Trail corridor.”*

The Forest Plan FEIS Record of Decision states, *“The land management plan provides for the nature and purposes of the Continental Divide National Scenic Trail (CDNST), in accordance with the programmatic requirements of the National Trails System Act, as amended, and the 2009 CDNST Comprehensive Plan. Therefore, I find that the land management plan is in compliance with this Act, and no updates to the 2009 CDNST Comprehensive Plan would be needed upon approval of the land management plan.”* This statement is not factual. The Forest Plan is inconsistent with the National Trails System Act as implemented through the CDNST Comprehensive Plan.

The Forest Plan CDNST plan components do not protect the CDNST from actions and activities that substantially interfere with the nature and purposes of this National Scenic Trail. These concerns were

documented in a Forest Plan Objection and are incorporated in these comments by reference – see Forest Plan Objection Section III part G, Section IV part F, and Section V part J (**Attachment B**).

Any proposed road construction and reconstruction in the CDNST corridor must be addressed through site-specific analyses. The described National Scenic Trail design features do not address CDNST desired conditions and any site-specific concerns. As prescribed, design features would allow for the degradation of desired ROS settings and Natural Evolving landscape character, and result in not meeting the established scenic integrity objective during the project implementation period. Each of these impacts would be a substantial interference to the nature and purposes of the CDNST, which is not allowed by the National Trails System Act.

To provide for the nature and purposes of the CDNST, the project proposed action would need to be modified to prohibit the construction (and reconstruction) of temporary and permanent roads within the CDNST management corridor of the existing and potential CDNST travel routes as depicted on the map in **Appendix A**.

Planning for the CDNST is reviewed in the attached CDNST Planning Handbook – see Chapter III parts C, D, and J (**Attachment A**) and incorporated in these comments by reference.

Yellowstone National Park – The EA should address the effects of the proposed action on Yellowstone National Park qualities, values, and natural resources.

Design Features – Design features presented represent programmatic direction since the specific location of application is yet to be identified. The exact extent and location of treatments to be applied is to be determined through an adaptive condition-based approach. The project does not disclose the site-specific effects of all of these actions, adjustments, or use of acceptable tools in the analysis along with the monitoring methods to be used to determine the effectiveness of each.

Design features are outlined in Appendix B of the NEPA document. Recreation design features beginning on page 99 state, “... 80. *CDNST: No landings within 300 feet of the Continental Divide National Scenic Trail. Temporary project roads should not be created along (roughly parallel to) the CDNST within 300 feet. Any necessary trail crossings by project roads should be limited to the fewest practical number and designed to minimize impacts to travelers along the CDNST....*”

Comment – Design features should limit the number of days that the CDNST travel route could be closed each year due to management activities.

Providing for only a 300-foot management buffer between the CDNST route and vegetation management activities does not protect CDNST qualities and values.

Specific to this project, permanent and temporary roads should not be constructed within the existing and potential route segment corridors of the CDNST (see **Appendix A**). Any proposed road construction and reconstruction in the CDNST corridor must be addressed through site-specific analyses.

Scenery design features begin on page 104 – “... 106. *Stumps: a) Remaining stumps that are evident within the Continental Divide National Scenic Trail’s (CDNST) and Highway 20’s immediate foreground (300 feet) would be horizontally cut, where possible, no higher than 6 inches on their uphill sides; lower*

than 6 inches is preferred... 108. Slash: Within the CDNST's and Highway 20's immediate foreground (300 feet), uncharacteristically large quantities of slash would not be left..."

Comment – The CDNST Scenic Integrity Objective in the project area is High. Providing for only a 300-foot management buffer does not provide for meeting this Scenic Integrity Objective.

Specific to this project, permanent and temporary roads should not be constructed within the existing and potential route segment corridors of the CDNST (see **Appendix A**). Any proposed road construction and reconstruction in the CDNST corridor must be addressed through site-specific analyses.

Project Proposed Action Recommended Modifications – Vegetation management actions must ensure that the actions are consistent with the Semi-Primitive Motorized ROS setting desired condition that states, *"Vegetation management may be present, but does not dominate the landscape or detract from the experience of visitors traveling throughout the semi-primitive motorized setting"* (FW-DC-ROS-07).

The Proposed Action for this project should be modified. The Forest Service should modify the proposed action by avoiding vegetation management actions that require temporary or permanent roads in:

- Semi-Primitive Motorized ROS settings;
- Existing CDNST management corridor; and
- Potential route segment corridor between Reas Pass and Yellowstone National Park/Targhee National Forest.

These areas to be avoided for vegetation management actions that require temporary or permanent roads are shown on the map in **Appendix A**.

The draft Environmental Assessment is programmatic and does not satisfy the requirements of NEPA for the implementation of project actions. The final NEPA document must contain sufficient site-specific information to foster informed decision-making and informed public participation, including indirect and cumulative effects information.

Please provide geospatial data with the release of the next NEPA document. This data should reflect proposed vegetation treatment actions and roads, such as depicted in Figure 2 of the draft EA.

Thank you for considering these comments.

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Attachment A – CDNST Planning Handbook
Attachment B – Forest Plan Objection

Appendix A – CDNST Corridor and Recreation Opportunities in the Project Area

