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USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, MT
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Re: Objection to the South Plateau Area Landscape Treatment

To whom it may concern,

We appreciate the opportunity to provide feedback on the final EA and object to the draft Decision Notice and Finding of No Significant Impact for the South Plateau Area Landscape Treatment Project. We would also like to extend our interest in meeting with the Forest Service on site to discuss our concerns, particularly site-specific conditions and long-term reclamation regarding the proposed actions and any potential impacts to the Continental Divide National Scenic Trail.

Representing approximately 2,000 members nationwide, the **Continental Divide Trail Coalition (CDTC)** is the 501(c)(3) national nonprofit organization formed in 2012 to work with the federal land management agencies to complete, promote, and protect the Continental Divide National Scenic Trail (CDNST). The Continental Divide National Scenic Trail (CDNST) was designated by Congress in 1978 as a unit of the National Trails System. The 3,100-mile CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West along the Continental Divide between Mexico and Canada. It travels through 20 National Forests, 21 Wilderness areas, 3 National Parks, 1 National Monument, 8 BLM resource areas and through the states of Montana, Idaho, Wyoming, Colorado and New Mexico. The vision for the CDNST is a primitive and challenging backcountry trail for the hiker and horseman on or near the Continental Divide to provide people with the opportunity to experience the unique and incredibly scenic qualities of the area.

The CDNST passes through Montana, Idaho, Wyoming, Colorado, and New Mexico, and is administered by the U.S. Forest Service in cooperation with the NPS, BLM, and Tribal, state, and local governments, as well as numerous partner groups including the CDTC. In 2020, CDTC signed an Inter-agency Memorandum of Understanding with the U.S Forest Service, the Bureau of Land Management, and the National Park Service, which identifies the Continental Divide Trail Coalition as a lead national partner in the management and administration of the Continental Divide National Scenic Trail. To date, CDTC has been successful in coordinating more than 250,000 hours of volunteer stewardship to maintain and improve the CDNST, building positive relationships with federal land managers and local trail-focused groups, organizing special events to help educate the public about the CDNST, implementing Trail Adopter and Gateway Community programs, and encouraging Congress to continue to appropriate funding for the CDNST in the USFS budget.

Background

The Continental Divide National Scenic Trail (CDNST) is far more than a path on the ground; rather, it is the sum of the myriad scenic, natural, cultural, and historical qualities of the areas surrounding the trail that make a journey along the CDNST unique and spectacular. The CDNST is protected and maintained not only for the physical trail itself, but more importantly, for the experience it provides.

The United States Congress designated the Continental Divide National Scenic Trail by an Act of Congress in 1978. The *Continental Divide National Scenic Trail Comprehensive Management Plan* was approved by the U.S. Forest Service and set forth as policy in 2009. This overarching policy direction serves to implement Congress's direction in the National Trails System Act, and is an essential tool for guiding decisions regarding Forest Plan direction for the CDNST. The *Comprehensive Plan* also incorporates FSM 2353.42 and 2353.44b.

Comments on the Proposed Project

CDTC appreciates the intent of this plan to reduce the risk of insect and disease infestation and improve the resiliency to wildfire in this region. We support the mitigation of these compounding variables in the face of the growing climate crisis that increasingly threatens forest health and habitat vitality, as well as the health and safety of trail travelers and communities. Without such proactive stewardship efforts on the part of land management agencies, the threat of more extreme wildfire and the expansion of infestation would potentially lead to more extreme conditions that would have an extremely negative impact to the region. We also greatly appreciate the consideration of the nature and purposes of the CDNST that is referenced throughout this plan. However, as we appreciate this proactive management plan and the consideration of the CDNST throughout the assessment, CDTC does have concern regarding the potential short- and long-term impacts to the trail, the trail corridor, and the natural, scenic, historic, and cultural resources for which the CDT, as a National Scenic Trail, preserves and provides access to. For that reason, CDTC objects to the actions described below that will substantially interfere with the nature and purposes of the Continental Divide National Scenic Trail.

With the establishment of the National Trails System, Congress gave sideboards for future projects, uses, and developments along Congressionally-designated trails. The National Trails System Act provides that, “(o)ther uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with administration of the trail.” CDTC is concerned due to the assertion that the planned actions will not substantially interfere with the CDT, despite the presence of numerous planned actions for this project that are directly within and surrounding the CDNST corridor that will alter the trail landscape, the nature of the corridor, and the experience of travelers. While we appreciate the consideration of the nature and purposes of the CDNST as established by Congress and referenced throughout the proposed plans for this project, it is vital that an analysis of these activities evaluates site-specific and cumulative impacts over the approximately 14 miles of trail that are in the immediate area of this project.

Primarily of concern are the potential degradation of natural and cultural resources in the impacted area, as well as negative impact to the CDNST experience due to disturbance from project actions. We urge further evaluation due to the evident sustained impacts from the proposed activity within the immediate corridor, the viewshed, and the surrounding ecosystem that make up the CDNST experience. If the plan is implemented in its current form, the immediate impact to the CDNST could be felt for over 15 years and the continued degradation of the CDNST and the CDNST corridor could have unforeseen cumulative consequences far into the future that are not analyzed or addressed in this plan. While the goal of this project is to mitigate future environmental degradation in this area, we believe that there is a balance to be had between planning for those conditions while ensuring strategies for preservation and protection regarding the CDNST's nature and purposes are not subordinate to other forest management objectives.

Particularly of concern is the affected environment. On page 20 of the EA, the agency identifies, “*A portion of the Continental Divide National Scenic Trail runs near the south and west edge of the project area.*” While this affected environment description is factually accurate, the EA fails to demonstrate or communicate a baseline for current conditions and, consequently, the plan fails to describe in detail the changes expected from baseline, current conditions to impacted, future conditions. The affected section

should describe the degree to which the CDT resources, qualities, and values are being protected. In this plan, the focus seems to be almost exclusively on the scenic resources. However, the CDT experience is one that is composed of many layers as described in the Comp. Plan nature and purpose statement. From the Comp. Plan, it is clear that scenic integrity is a priority factor for consideration, but that the values for which the CDT are being protected, including desired cultural landscape, recreation setting, conservation purposes (such as connectivity which is an administrative priority), and others must also be addressed in equal parts to the scenic integrity of the trail.

The construction of 5.36 miles of temporary roads within the half-mile corridor on either side of the CDNST, even if it is more than 300 feet from the trail as stated in the plan, will have a significant impact on the nature of the CDNST. The impact of temporary roads is not confined to a small temporal window but often continues to affect the surrounding area for years to come, 10-20 years cumulatively at least, after the establishment of the temporary road. This will undoubtedly have an impact on the qualities, values, and established recreation setting characteristics defined in the 2009 CDNST Comprehensive Plan. In this instance where access to a specific area (timber stand) is needed for long-term management, a temporary road should not be a substitute to the construction of a classified road. Such long-term activity can cause significant changes to the surrounding ecosystem, including habitat fragmentation and an additional barrier in migratory corridors, and the disturbance to recreationists in the form of visual and auditory obstruction. The negative impact to the surrounding environment is compounded by the many steps involved in successful road restoration for a temporary road that lead to environmental degradation. The road bed is broken apart to remove the compacted soil layers, and stream channels fully restructured. Vegetation and other natural features often need to be replaced back on the slope. Additionally, long-term monitoring of these restoration activities is necessary to achieve these desired site conditions, and ensure that they are sustained. As any further action is considered, CDTC encourages all federal, state, and local management agencies to conduct site-specific and cumulative analysis to determine the magnitude of any potential impact to the trail.

In the CDT Comp. Plan, the Plan states (bold added for emphasis):

“To retain or promote the character for which the trail was designated, new or relocated trail segments should be located primarily within settings consistent with or complementing Primitive or Semi-Primitive Non-Motorized Recreation Opportunity Spectrum classes. Road and motorized trail crossings and **other signs of modern development should be avoided to the extent possible**” .

The construction of temporary roads 300 ft from the trail, accompanied by timber harvest activity within the corridor and vehicular traffic, would certainly be categorized as “signs of modern development”. And while we understand that for the purposes of forest health some mechanized and motorized activity might be required, the proximity to the trail of these activities for a sustained amount of time in addition to the construction of roads with lasting impacts far beyond the 5-year window of the project, could potentially be avoided without risking forest health if other alternatives were considered. We encourage the agency to consider other alternatives that would help to avoid modern developments in close proximity to the trail, substantially interfering with the trail’s nature and purposes.

The CDT Comp Plan directs the U.S. Forest Service to use the ROS framework to provide recreation opportunities that support the CDT nature and purposes. The presences of temporary roads, motorized travel, and the auditory and visual disturbances related to this activity will substantially interfere with the trail experience during the 5-years of this project. This will result in a Semi-Motorized or Roded Natural ROS setting, which is not consistent with the direction given in the CDT Comp Plan and is not clearly described in the decision’s planned actions and impacts to the CDT. Again, the lack of information describing the baseline conditions of the CDT in this area and further lack of the information on the

changes to these conditions from the impacts of this project, results in a decision that does not clearly communicate to the public that the agency has thoroughly reviewed and evaluated the impacts to the CDT which substantially interfere with the nature and purposes of the trail. This lack of a baseline outlining conditions and expected changes also results in a general public that is not fully equipped to understand, analyze, or respond to the proposed plan because the impacts and consequences are not made clear. CDTC objects to the finding that the motorized activities just outside of 300ft of the trail will not substantially interfere with the nature and purposes of the CDT, and we find that the EA fails to evaluate impacts using the ROS framework to provide for protection of the nature and purposes of the CDT.

Furthermore, as a concern level 1 travel route, with the scenic integrity objective of high or very high spending on the section of the CDNST, the impacts to the surrounding viewshed, not just the area of the CDNST corridor, is of concern (FSM 2382.1). The 2009 CDNST Comprehensive Plan states, “*The Forest Service will apply the Lands Aesthetics - Scenery Management System to address visual resources management on National Forest Service Lands.*” (FSM 2380) We appreciate that this standard is reflected in the planning for this project but urge consideration of the impacts that temporary roads, vehicular traffic, and other activities related to timber harvest activities to the scenic character of the CDT, especially if roads are allowed at 300 ft away from the trail. The scenic character of the trail is an essential feature to provide for the primitive settings within the CDNST corridor, as established by Congress. Management direction in the Custer Gallatin Plan for Semi-Primitive Motorized and Roaded Natural ROS classes, even for a 5-year window, allow uses that would substantially interfere with the nature and purposes of the CDT if the identified desired condition came to fruition. Where the allowed non-motorized activities reflect the purposes for which the CDT was established, the classification of Primitive and Semi-Primitive Non-Motorized ROS classes and high and very high scenic integrity allocation would normally protect the nature and purposes of the CDT. The construction of temporary roads would have a lasting impact on the scenic integrity of the CDNST, and furthermore, the lands managed for timber production are in areas highly visible from CDNST viewpoints. As these proposed actions are considered, CDTC urges site-specific evaluation of the potential degradation of the CDT experience in this area. Without further consideration of these impacts to the CDT experience, this plan has the will substantially alter the nature of the CDNST in this region and negatively alter not only the viewshed, but the CDT experience overall, far into the future. We encourage use of the Scenic Character Descriptions to help establish a baseline, and we would welcome the opportunity to do a site visit to this area alongside the agency to determine the impact of timber harvesting activity on a site-by-site basis.

There are also a number of ancillary activities related to this project that could also alter the area and negatively impact the nature and purposes, for which the trail was designed. Significant habitat alteration and increased human activity in the area due to temporary road construction and, consequently, timber harvest over a period of 15 years, could have unintended negative impacts to the sensitive habitats and ecosystems within this area. Increased levels of activity and disturbance to these sensitive environments have been shown to cause significant habitat fragmentation when introduced to an area, which has cumulative impacts for wildlife in this region, including along the CDNST. CDTC encourages further, detailed review of the distinct potential impacts of these ancillary activities on specific wildlife and individual habitat. Furthermore, CDTC encourages a broad analysis of cumulative impacts in the area on local wildlife and forest health to ascertain any potential negative impacts these ancillary activities may contribute to based on the intended CDNST experience. A thoroughly described condition assessment of current conditions which help set a baseline would be helpful in evaluating the impacts of proposed ancillary activities, both in the short- and long- term.

Lastly, the safety of CDNST travelers is also the top priority for CDTC, and for this reason, the potential for impact to trail travel is of concern. Many trail travelers plan weeks, months, and even years in advance, and require the most up-to-date information to ensure that preparation for their time on the CDT is informed, safe, and enjoyable. As the project moves forward, we urge project managers to account for

increased trail travel disturbances for travelers due to project activity by providing advance notice of any activity that could impact trail traveler's experience. CDTC is also happy to amplify notices within our communication networks to make sure traveler's on this section of trail are prepared for activities related to this project.

Thank you again for the opportunity to provide feedback to this plan. While we object to components of the plan, we appreciate the agency's proactive approach to forest health, and hope that we can collaborate on direction moving forward that ensures the preservation of the CDT experience aligns with forest health goals and vice-versa. As the leading organization for the protection of the CDNST, CDTC is happy to assist in this process and consult on any potential impacts to the CDT. We would also like to extend our interest in meeting with the Forest Service on site to discuss the site-specific impacts to the CDNST and discuss long-term reclamation efforts in order to ground-truth the proposed actions. If you have any questions, please contact Luke Fisher, Trail Policy Program Manager, by phone at (406) 272-6179 or by email at Lfisher@continentaldividetrail.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Luke Fisher".

Luke Fisher
Trail Policy Manager
Continental Divide Trail Coalition
Helena, MT

cc: Ben Lara, CDNST Program Administrator, USFS; Sharon Buccino, Chair, CDTC Trail and Lands Committee