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Organization: Continental Divide Trail Coalition

Title: Trail Policy Manager

Comments: Provided as an attachment as well:

Re: Objection to the Draft Record of Decision, Final Environmental Impact Statement, and Revised Land Management Plan for the Cibola National Forest

Dear Objection Reviewing Officer,

Representing approximately 2500 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 25 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. CDTC's 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 and raising over \$5 million in private funds 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 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.

CDTC Has provided the following additional materials with our Objections:

CDTC Comments on the Cibola National Forest Draft Land Management Plan and Draft Environmental Impact Statement on November 7, 2019

CDTC Atlas of the CDT

CDTC's: CDT Experience Policy

Statement of Objection:

With these factors in mind, and upon review of the Draft Record of Decision, Final Environmental Impact Statement, and Revised Land Management Plan for the Cibola National Forest, the Continental Divide Trail Coalition is submitting the following objections regarding the Cibola National Forest Plan Revision and associated documents. The relevant objections are as follows:

Objection 01: CDNST plan components described in The Plan do not align with the intended nature and purposes of the CDNST as established in the 2009 Comprehensive Plan, guided by the National Trails Act. Specifically, the stated Desired Conditions, Standards, and Guidelines for the CDNST do not align with the 2009 Comprehensive Plan, which is the established management plan for the trail under which all Forest Service plan components should align.

Objection 2: None of the developed alternatives addressed CDNST concerns and legal requirements. Particularly urgent, is the exclusion of any alternative that identifies CDNST high potential route segment corridors that are protected for the nature and purposes of a National Scenic Trail.

Objection 3: The Plan does not reflect adequate consideration of the impacts of each alternative in regards to the Recreation Opportunity Spectrum (ROS) or the Scenic Integrity Objective (SIO) specifically related to the trail. Management objectives of the trail are not secondary to other management objectives, and cumulative and site-specific impacts should be adequately considered and included in The Plan, as well as monitoring plans to ensure stewardship continues to meet the established natures and purposes of the trail and informs the establishment of a carrying capacity for the trail throughout the Cibola.

Standing: CDTC has standing as we submitted substantive comments on the Cibola National Forest Draft Land Management Plan and Draft Environmental Impact Statement on November 7, 2019. These comments are included with this objection.

Issue and Statement of Explanation - CDTC Objection 1: CDTC objects to the lack of alignment with the 2009 Comprehensive Plan and the National Trails System Act. Primarily, the Desired Conditions, Standards, and Guidelines described in The Plan do not meet the nature and purposes of the CDNST.

The proposed Land Management Plan is not consistent with the nature and purpose of the CDNST, and, within this corridor, we urge the Forest Service to adhere to the guidelines in the National Trails System Act, FSH 2350, and the 2009 Continental Divide National Scenic Trail Comprehensive Plan.

On page 150, The Plan states:

"Motorized use is allowed on the Continental Divide Trail only under certain conditions that fall within exemptions stated in the National Trails System Act. In general, established motorized uses, both summer and winter, are allowed to continue, but new motorized uses will not be designated on the trail[hellip]"

This statement does not align with the CDNST Comprehensive Plan and should be deleted. Motorized use may continue only if:

"5) Is designated in accordance with 36 CFR Part 212, Subpart B, on National Forest System lands or is allowed on public lands and:

(a) 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

(b) That segment of the CDNST was constructed as a road prior to November 10, 1978; or

(6) In the case of over-snow vehicles, is allowed in accordance with 36 CFR Part 212, Subpart C, on National Forest System lands or is allowed on public lands and the use will not substantially interfere with the nature and purposes of the CDNST." (CDNST Comprehensive Plan)

CDTC feels the guidance outlined in the Comprehensive Plan contradicts this component of The Plan. While we support that "new motorized uses will not be designated on the trail[hellip]", there needs to be a plan of action to determine whether existing motorized use on the trail causes substantial interference, and if so, new designations, carrying capacities, and/or the identification and relocation of a new route must be prioritized. Simply stating, "In general, established motorized uses...are allowed to continue" is a mischaracterization of and a deviation from the direction given in the Comprehensive Plan and abdicates the obligations pertaining to the monitoring and assessment needed to ensure stewardship of the trail aligns with the established nature and purposes of the CDNST.

Furthermore, the Desired Conditions, Standards, and Guidelines for the Continental National Scenic Trail in The Plan are not aligned with the Comprehensive Plan or the National Trails Act, and suggest violation of the National Environmental Protection Act, the National Trail System Act, and the National Forest Management Act.

Desired Conditions for the Continental Divide National Scenic Trail

DA-DC-CDNST

The first desired condition states:

The Continental Divide National Scenic Trail provides high-quality scenic, primitive hiking, and pack and saddle stock opportunities. The natural, historic, and cultural resources along the trail corridor are conserved. Other activities and opportunities are allowed when compatible with the nature and purposes of the trail.

This description does not align with the CDNST Comprehensive Plan.

Solution: As stated in our comments, this desired condition should read:

The Continental Divide National Scenic Trail is a well-defined trail that provides high-quality scenic, primitive hiking, and pack and saddle stock opportunities. The natural, historic, and cultural resources along the trail corridor are conserved. Other non-motorized activities and opportunities are allowed when compatible with the nature and purposes of the trail.

The inclusion of the phrase "well-defined trail" is critical to ensuring the experience of trail travelers and forest visitors is a safe and enjoyable one. Without this qualifier, there could be concerns about the on-the-ground conditions of the trail, the standard of accessibility for the CDT Experience, and the transparency, for the public, of the location of the trail and its corridor in relation to any actions impacting the trail.

Furthermore, the omission of "non-motorized activities" in the third sentence of this desired condition further confuses the established nature and purposes of the trail. As the National Trail System Act states:

"The use of motorized vehicles by the general public along any national scenic trail shall be prohibited and nothing in this Act shall be construed as authorizing the use of motorized vehicles within the natural and historical areas of the national park system, the national wildlife refuge system, the national wilderness preservation system where they are presently prohibited or on other Federal lands where trails are designated as being closed to such use by the appropriate Secretary." (National Trails System Act, Section 7)

Recognizing the intention of the legislation establishing the Trail and the Comprehensive plan, it must be made clear that there are substantial differences between non-motorized and motorized access, and that neither is intended for the CDT along its entirety or in the future of the trail's eventual completion as a footpath primarily for hikers and equestrians. Available language, as found above in the phrasing pulled from our comments above, can be found in the CDNST Comprehensive Plan. Deviation from this wording is a contradiction of Forest Service Policy.

The second desired condition states:

Viewsheds from the Continental Divide National Scenic Trail are consistent with desired conditions for scenery, and have high scenic values. The foreground of the trail (up to 0.5 mile on either side) is natural appearing.

This desired condition does not clearly state the Scenic Integrity Objective.

Solution: Clearly state the Scenic Integrity Objective in the Desired Solution. The Scenic Integrity of the trail is of high or very high scenic values. While the foreground is priority, the cumulative viewshed of the trail, as a ridgeline trail with sweeping views, should be taken into consideration when actions could have negative impacts on the natural, historic, and cultural resources along the trail. As the 1976 Study Report stated, and the Comprehensive Plan reiterates, the trail is intended for, "access to those lands where man's impact on the environment has not been adverse to a substantial degree and where the environment remains relatively unaltered." If the environment is altered and man's impact on the environment impacts the experience, including the scenic values, then the purpose of the CDNST begins to deteriorate as man's impact grows. These impacts should be evaluated on a site-specific basis and a cumulative basis for the trail throughout the Forest.

Standards for the Continental Divide National Scenic Trail

DA-STD-CDNST

2.) The second standard states:

Management of the trail shall comply with the most recent Continental Divide National Scenic Trail comprehensive plan. Best available scientific information can be used in lieu of the comprehensive plan if the plan is out of date with science.

CDTC supports the efforts on the part of the Cibola NF to manage the CDNST in a way that adapts with the newest science. However, we believe this phrasing could be strengthened. In this standard, the phrasing "in lieu of" could lead to management that is not compliant with the CDNST Comprehensive Plan. The Comprehensive Plan should, hopefully, never be out of date, since there are processes for amending and adopting new direction that can update the Comprehensive Plan, and management practices regarding the CDNST should never contradict or deviate from the Comprehensive Plan.

Solution: CDTC suggests the following rewording of this standard to ensure future compliance with the CDNST Comprehensive Plan and management practices that embrace the newest science:

Management of the trail shall comply with the most recent Continental Divide National Scenic Trail comprehensive plan. Best available scientific information should be used to update management direction and actions that align with the comprehensive plan.

Once again, CDTC commends the Cibola National Forest planning team for the inclusion of this standard, as it embraces the adaptive foundation that all planning processes need. With this change in language, we believe it ensures future compliance, while allowing for adaptive and cooperative management approaches that can embrace new science. This can strengthen the cooperative stewardship model, particularly in recognizing the new science being elevated regarding the effectiveness of Indigenous stewardship and the best management practices therein.

4.) The fourth standard states:

Motorized use shall not be authorized on the Continental Divide National Scenic Trail except on segments currently located on a road or trail designated for motorized use per the motor vehicle use map. No new motorized special use permits, or events shall be permitted on the Continental Divide National Scenic Trail.

This standard is not consistent with implementation of the Comprehensive Plan and related policy, under the National Trails System Act. The Travel Management Rule does not limit Forest Plan decisions for motorized use on the CDNST and within the CDNST corridor.

Solution:As our (attached) previous comments to the Proposed Plan stated, this standard is inconsistent with CDNST management policy. Per 16 U.S.C. 1246(c), the only motorized uses allowed on the CDNST are for administrative use and emergencies, private land access, and those that existed at the time of designation - i.e existing uses. New motorized use would not be allowed on future relocated or newly constructed Trail segments; additionally, newly relocated or constructed segments of the CDNST should not be located on a road or trail designated for motorized use. Therefore, there is no situation that envisioned where the CDNST in the Cibola National Forest could legally be opened to motorized uses that don't already exist, making the phrase "except where the trail is located on a designated road or trail or for administrative or permitted use" redundant and confusing. A suggested solution would be substituting this phrase for a more clear alternative so that the Standard reads, "New motorized uses shall not be authorized on the Continental Divide National Scenic Trail. Existing motorized use may continue on the CDNST."

DA-GDI-CDNST

The first guideline states:

To be consistent with the most current comprehensive management plan, the Continental Divide National Scenic

Trail route should be relocated to occur off roads in the life of the plan. The trail will be located as close to the geographic Continental Divide as possible.

This objective is vague and needs to be more specific in order to align with the Comprehensive Plan.

Solution: While we continue to support the inclusion of this guideline (as stated in previous comments to the proposed plan), this standard could be strengthened from specifically citing the CDNST Management(designated?) Area and standards for Optimal Location for the trail. The timeline for the action is an appreciated specificity and hopefully a model for future management guidelines in other Forests.

The second guideline states:

To protect or enhance scenic qualities of the Continental Divide National Scenic Trail, management activities should be consistent with the scenic integrity objective of high within the foreground of the trail (up to 0.5 mile on either side).

This guideline is inconsistent with the CDNST Comprehensive Plan regarding the Scenic Integrity Objective (SIO).

Solution: Management of the CDNST seeks to retain a SIO of high or very high for the entirety of the trail, in keeping with the trail's nature and purposes. In order to align this guideline with the Comprehensive Plan and the intended CDT Experience, the wording should be changed to, "...with the scenic integrity objective of high or very high within the foreground of the trail[hellip]"

3.) The third guideline states:

Management projects and activities within the Continental Divide National Scenic Trail corridor (up to 0.5 mile on either side) should be compatible with the original intent for the trail's national designation as well as current management direction.

This guideline is, seemingly, redundant and ambiguous.

Solution: This guideline should be removed or altered to align with the Comprehensive Plan by stating the specific intent, possible impacts, and current management direction this guideline hopes to contribute to the stewardship of the CDNST. Additionally, this guideline, arguably, lowers the threshold for impacts to the CDNST to only the mile-wide corridor, ignoring the potential impacts that actions and activities outside the corridor could have on the trail. The viewshed, the ecosystems, and the nature of a primitive experience are all included in the impacts to the trail experience outlined in the 1976 Study Report and reiterated in the Comprehensive Plan. In order to avoid unintended impacts to the trail experience, activities and actions should be mitigated through site-specific and cumulative analysis, encapsulating more than just the .5-mile corridor on either side of the trail.

7.) The seventh guideline states:

To retain the character for which the trail was designated, management actions, including special use authorizations, should be consistent with the recreation opportunity spectrum classes of the Continental Divide National Scenic Trail.

The guideline does not align with the current management practices under the Comprehensive Plan.

Solution: While we appreciate the sentiment of this guideline, it is too vague and the wording is inconsistent with management practices. The wording should be changed to read, "should be consistent with Primitive and Semi-Primitive Non-Motorized Recreation Opportunity Spectrum classes." The "of the Continental Divide National Scenic Trail" should be removed, as the ROS are not specific to the CDNST or National Trails, only the system under which the Forest Service evaluates and manages its management areas.

8.) The eighth guideline states:

Uses that could conflict with the nature and purpose of the Continental Divide National Scenic Trail should be prohibited when it is determined that the use would interfere with the nature and purpose of the trail.

This guideline is inconsistent with the Comprehensive Plan.

Solution: As stated in our previous comments to the proposed plan, this guideline must remain consistent with the language in the CDNST Comprehensive Plan. The Comprehensive Plan clearly states the standard of "substantial interference" as a qualifier when evaluating impact to the CDNST. To remove this language begins to change the direction for management of the CDT outside of an open public engagement process and uses administrative action to change the intention of the Comprehensive Plan and should not be allowed. To resolve this issue, the guideline should add "substantially" before interfering. This will help to ensure the threshold of interference is not inadequately met for decisions and actions that would oppose the nature and purposes of the trail.

11.) The eleventh guideline states:

New road or motorized trail construction across or adjacent to the Continental Divide National Scenic Trail should be avoided unless needed for resource protection, provide access to public lands, or protect public health and safety.

This guideline is not consistent with the Comprehensive Plan, the National Forest Management Act, or the National Trails System Act.

Solution: Referenced in our previous comments, which are attached, we believed the reference to public land access should be "private land access" in DA-GDL-CDNST-11 and may be a typo/oversight. The guideline as currently written would encourage new road or motorized trail construction across or adjacent to the CDNST along its entire length of the Cibola National Forest, which is clearly not consistent with the CDNST Comprehensive Plan. This access needs to be better defined and made consistent with the National Trails Act and the Comprehensive Plan, specifically that it should be for access for private landowners and administrative needs. As the Comprehensive Plan details, the construction of routes should be evaluated and managed using substantial interference determinations. It should be rewritten as follows:

New road or motorized trail construction across or adjacent to the Continental Divide National Scenic Trail will not be allowed unless it is needed for resource protection, to provide access to private lands, or to protect public health and safety AND is evaluated in order to ensure that substantial interference of the CDNST is mitigated.

The above comments demonstrate a consistent deviation and inconsistency with the CDNST Comprehensive Plan, the National Forest System Act, and the National Trails Act. Under this Forest Plan, management actions and activities on the CDNST, within the CDNST corridor, and within the wider area of concern are not aligned with the CDNST Comprehensive Plan and related policy. In regards to the Desired Conditions, Standards, and Guidelines of concern listed above, there is no justification or foundational policy given that leads to a reason to violate the established management practices.

Violations of Law, Regulation or Policy: National Trails System Act; National Forest Management Act; 2009 CDNST Comprehensive Plan; FSH 2353.44.

Issue and Statement of Explanation - CDTC Objection 2: None of the developed alternatives addressed CDNST concerns and legal requirements. Particularly urgent, is the exclusion of any alternative that identifies CDNST high potential route segment corridors that are protected for the nature and purposes of a National Scenic Trail.

On page 217, the Cibola Final Environmental Impact Statement states:

The Cibola National Forest is home to the Continental Divide National Scenic Trail. The scenic category refers to trails that are extended trails, located to provide maximum outdoor recreation potential and the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.

While this statement is correct and aligns with the National Trails System Act of 1968, which is also described in the FEIS, the affected environment seemingly does not take into consideration the CDNST corridor and does not give any reference to the high potential route segments that could be impacted by the alternatives under consideration in The Plan. As is recognized in the FEIS and The Plan, and is supported by the National Trails System Act and the CDNST Comprehensive Plan, protecting the values for the CDNST, including the landscapes, cultural values, scenic integrity, and the conservation purposes of the CDNST is of critical importance within the CDNST Management Area and to the CDT Experience. Many of these important features of the CDNST are not addressed, regarding cumulative or site-specific analysis of potential impacts from the alternatives.

For example, management areas with a primitive or semi-primitive Recreation Opportunity Spectrum settings should constrain the construction of permanent or temporary roads, an event that would be a rarity in primitive or semi-primitive settings. Yet, the FEIS does not seem to take into consideration these impacts to the cultural, scenic, or historic values of the CDNST, the CDNST corridor, or the related ROS settings. This is particularly true of high potential route segments, of which the FEIS does not seem to state a direction for monitoring, mitigating, or avoiding the degradation of these standards, and addressed further in the next section of this objection. The impacts of fire management, timber production, range management, vegetative management, and timber production all impact the current routes of the CDNST, and current management practices will impact the ability

of the Forest Service to relocate the trail onto high-quality routes in the future.

Additionally, there are many areas within the FEIS, where high potential routes exist, but there is no indication that there are potential monitoring, management, or mitigation strategies to be implemented under The Plan to protect these areas for the nature and purposes of the CDNST. There are 45 miles of the CDNST through the Cibola National Forest. Of those 45 miles, only about 25 miles are current trail miles, with approximately 20 miles of the CDNST still located on roads. This means that about 20 miles of high potential routes, at least, exist for future planning efforts, but the current stewardship plan needs to account for the miles if it is a priority of the Forest Service to relocate those 20 road miles onto high-quality trail miles.

Currently, Work is done in areas around the Cibola, including Alamosa Creek, an area the Bureau of Land Management and USFS have worked cooperatively to provide a permanent, high-quality route. The potential routes also include areas of the Zuni Mountains, which remain viable options for CDNST extension. Without any indication within the FEIS that future stewardship of these areas will take into consideration their cultural, scenic, and historic values, all of which are essential to the CDT Experience and CDNST management, there is increased potential that these areas will be managed in a way that degrades the very qualities that make them a contender for a permanent, high-quality travel route for the CDNST in the future. Moving the trail off of roads and other routes inconsistent with the Comprehensive Plan and the National Trails System Act is a critical, and seemingly a priority when considering the Desired Conditions, Standards, and Guidelines within The Plan. To align the FEIS with this priority of permanently locating the CDNST on a high-quality route, which does exist in The Plan, the high potential routes must also be managed accordingly.

Solution: Conduct an additional Environmental Impact Statement with at least one alternative that identifies CDSNT high potential route segment corridors, guided by the Comprehensive Plan and the NTSA. The routes identified in the alternative should be protected with plan components that align with the nature and purposes of the CDNST. Additionally, these routes, taking into consideration the .5-mile wide corridor on either side, should be at least 1-mile wide, if not more, in order to give flexibility for future route layout considerations.

Violations of Law, Regulation or Policy: National Trails System Act; 2009 CDNST Comprehensive Plan; FSH 2353.44.

Issue and Statement of Explanation - CDTC Objection 3: The Plan does not reflect adequate consideration of the impacts of each alternative in regards to the Recreation Opportunity Spectrum (ROS) or the Scenic Integrity Objective (SIO) specifically related to the trail. Management objectives of the trail are not secondary to other management objectives within the proposed Forest Plan, and cumulative and site-specific impacts should be adequately considered and included in The Plan, as well as monitoring plans to ensure stewardship continues to meet the established nature and purposes of the trail.

As stated above in regards to DA-STD-CDNST-4, and in our previous comments submitted to the proposed plan,

there lacks analysis of the impact of ROS settings that do not meet the nature and purposes of the CDNST. While we appreciate the edited standard that can be found in The Plan now, there is still room for improvement of that standard, and the management, monitoring, and mitigation strategies that must accompany ROS setting determinations. In The Plan, there is no indication that there are strategies for monitoring recreation use on the CDNST, which is essential in determining whether current uses are impacting the nature and purposes of the CDNST. Such an analysis would also help to determine a carrying capacity for the 45 miles of trail located within the Cibola, and help to plan for the future location of 20 miles of high-quality trail that need to be moved off road.

As CDTC suggested in previous comments, in regards to analyzing the carrying capacity of the CDNST, we recommend the following actions:

1. Include a monitoring indicator measuring the number of water sources to be developed in the next 5-10 years.
2. Add a monitoring indicator to measure increases in signage and suitable access over the next 5 years.
3. Establish carrying capacity and monitoring with standards and indicators relative to the CDNST.

The ROS settings, again, fail to take into consideration high potential routes for the future of the CDNST. Without accounting for these ROS settings where high potential routes exist, these routes are under threat of degradation that would deteriorate their classification as a high potential route. Current route settings do not take into account activities and actions such as timber production or road construction for these high-quality potential routes. Even though the plan states a goal of moving the CDNST completely off of roads, The Plan does not set the foundation for such an ambitious, and much appreciated, goal. Timber management and road construction can change an area for decades, and the increase of human activity related to these activities can forever alter the ecosystem and existing plant and wildlife populations. These activities would significantly alter the ability of the Forest Service to identify future routes of the CDNST that provide for the high-quality experience that fit the nature and purposes of the CDNST. Identifying high-potential routes and locating the CDNST to an area that meets the nature and purposes of the trail is a requirement of the National Trails System Act, as integrated under the requirements set forth in the National Forest Management Act.

In regards to high potential routes, CDTC supports FW-GDL-WRF-17 providing guidance that groundwater should be used preferentially over surface water sources for new or redesigned uses such as livestock, recreation and other forest uses to protect surface water sources which are at risk due to drought while providing for long-term management. One of the more critical issues for the CDNST across the existing location and future proposed locations for the CDNST is access to water resources for Trail visitors. This must be addressed in a sustainable way before new trail routes are open to the public.

Violations of Law, Regulation or Policy: National Trails System Act; National Forest Management Act; 2009 CDNST Comprehensive Plan; FSH 2353.44.

Conclusion

As an organization with many connections in the surrounding communities and a dynamic working knowledge of the area, the CDTC is uniquely positioned to inform and assist as this project moves forward, and we look forward to providing any insight that could be productive for this discussion. If we can be of further assistance in aligning The Plan with the CDNST Comprehensive Plan and the National Trails System Act, we would readily provide our expertise. Particularly of use for future planning, could be the Scenic Inventory Assessment that should be released soon and add to the conservation science we have about the CDNST, in order to make the most well-informed decisions about the future of the trail.

We readily embrace the adaptive management practices demonstrated here, as is a foundation of the Planning Rule, and hope that such adaptive measures will be forward-looking enough to plan for a CDNST that is completely located on high-quality trails in the Cibola. In particular, we feel that the repeated emphasis on collaboration with partners and volunteers, tribes, landowners, recreation users, and other Cibola NF stakeholders can only improve management of the forest, and we offer our support wherever it is helpful, whether that be assisting in evaluation of potential CDNST reroutes, building new trail sections, or educating CDNST users about management activities occurring along the trail corridor.

We appreciate the opportunity to provide comments on the scoping of this proposed action.