

**BEFORE THE OFFICE OF THE REGIONAL FORESTER
REGION ONE – USDA FOREST SERVICE**

Objection Reviewing Officer

Cindy Weaver

Objector

v.

CHIP WEBER

FLATHEAD FOREST SUPERVISOR

Responsible Official

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**NOTICE OF OBJECTION
PURSUANT TO
36 CFR 218**

DECISION OBJECTED TO:

Crystal Cedar Project Draft Decision Notice and Finding of No Significant Impact (hereafter
Crystal Cedar, Project, Planning Process, DN and FONSI)


Hungry Horse – Glacier View Ranger District

Chip Weber, Flathead Forest Supervisor, November 14, 2019.

Objector:

Cindy Weaver

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Cindy Weaver 12/22/19

I have been a resident of Whitefish for 25 years. During that time, I have been an avid hiker, Nordic skier, biker and general outdoor enthusiast. My two daughters participated in the Chet Hope Youth Ski League and the Glacier Nordic Ski team. Last month, I purchased a townhome in Meadow Lake Resort. One of the draws to Columbia Falls was that Meadow Lake Golf Course was groomed last year and would be again. What a great opportunity to have skiing out my front door. The Crystal Cedar area offers an even great opportunity for Nordic Skiing on excellent terrain. This could be a great boost to the Columbia Falls area. I participated in three meetings with Rob Davies and other members of his staff beginning on December 3, 2019 on the forest planning process for Crystal Cedar and the potential for including Nordic Skiing in the EA. I filed a comment during the comment period requesting Nordic ski trails be considered in the planning process.

OBJECTION

The Crystal Cedar DN and FONSI does not comply with procedural and substantive requirements of the National Environmental Policy Act (NEPA). Members of the public submitted comments in the scoping and draft EA stages requesting Nordic ski trails be analyzed in the Crystal Cedar Planning Process. The FNF is obligated to analyze issues identified through public comment submitted in a timely fashion and within the project purpose. Nordic ski trails are consistent with the first purpose stated in the Crystal Cedar Scoping Document released October 15, 2018 which was to “Provide sustainable trail-based recreation opportunities close to local communities that are compatible with other resources”(Crystal Cedar Scoping Document page 1). Despite meeting the project purpose requirements, FNF staff elected instead to ignore public comments requesting investigation of Nordic ski trails in the Crystal Cedar Planning Area. FNF staff failed to provide defensible evidence supporting their internal decision not to analyze Nordic ski trails.

Members of the public participated in the Crystal Cedar planning process in good faith. The NEPA process is the only opportunity for the public to have a voice in management of our public forests. Intentionally omitting legitimate issues identified by the public is a clear procedural violation of NEPA.

Because of the procedural violations, the Crystal Cedar EA omitted the required objective investigations requested by the public. The FNF’s draft DN and FONSI lacks the substantive analysis requested by the public. As a result, the draft DN and FONSI is not supported by documents in the administrative record of this NEPA proceeding.

REASONS FOR OBJECTION

- I submitted comments in the Crystal Cedar EA process in good faith.
- It was my expectation that my comments requesting the potential of Nordic ski trails in this process would be treated objectively. It was encouraging to see the recreational opportunities for summer hiking, biking and equestrian trails included. Nordic ski trails deserve the same level of objective investigation and analysis.
- It seemed there was a concern for incompatibility with other winter recreation activities—namely snowmobiling. I, and several of my skiing buddies, annually purchase a Flathead Snowmobile Association membership and ski on their groomed trails. We have always found them to be friendly, respectful and welcoming. On several occasions we have chatted in the parking lot or on the trails. There are examples throughout the western states, including Montana, where motorized and non-motorized winter recreationists share the same parking infrastructure to access their respective designated trail networks. Give the Flathead a chance to pursue the same partnership(s).
- Lumping Nordic skiing/trails together with recreational snowmobiling is not a fair treatment of Nordic skiing. The 2003 FEIS for Winter Motorized Travel on the FNF (Forest Plan Amendment 24) does not include an analysis of the environmental effects of Nordic ski trails and clearly stated that using a snowmobile to groom Nordic ski trails is not the same activity as recreational snowmobiling.
- The sport of Nordic skiing has seen great growth in the last five years in the Flathead Valley. In my opinion this is due to two major factors. 1) Increase in health/fitness awareness among baby boomers and the younger generation. 2) Increase in population in the Flathead Valley. I feel these two factors will continue to increase the number of skiers looking for skiing opportunities.
- The community of Columbia Falls would support a Nordic area of their own. This season, Glacier Nordic Club offered their entry level youth program, the Chet Hope Youth Ski League, in Columbia Falls and the limit was reached before the deadline for registration. Having an area we could ‘call our own’ would be a great amenity to the community.

Relief

The draft DN and FONSI fails to consider public requests to investigate Nordic trails in the Crystal Cedar Planning Process. The FNF must restart the Crystal Cedar Planning Process. The new environmental review must include an objective investigation of Nordic ski trails in the Crystal Cedar Planning Area. Objective analysis must include a comprehensive examination of conditions and opportunities in the planning area including inventory of the existing trail and road network, evaluation of other recreation activities in the planning area, FNF proposed timber harvests, potential parking areas, access roads and wildlife resources. The FNF should be required to develop a range of Nordic ski trail alternatives designed, in part, to mitigate potential conflicts with other users and avoid negative effects on other resources.

Conclusion

Developed Nordic skiing opportunities are limited in the Flathead Valley. Demand for the current Nordic ski opportunities exceed the parking capacity at trailheads. The population in the Flathead Valley is projected to double in the next 10 years.

Creating new Nordic ski opportunities on adjacent FNF lands requires an environmental review planning process. The universe of locations on the FNF where Nordic ski trails could be developed is limited due to seasonal wildlife closures. The Crystal Cedar Planning Area was identified in the new FNF Forest Plan as an area for focused recreation development. The Crystal Cedar Project Environmental Assessment (EA) is the logical process for the FNF to evaluate Nordic ski opportunities.

The FNF must not approve the Draft DN and FONSI for the Crystal Cedar EA. The FNF violated NEPA procedures by failing to evaluate issues raised in a timely fashion by the public. The FNF unilaterally elected to eliminate issues raised by the public from analysis in the Crystal Cedar NEPA process but failed to substantiate their decisions with supporting evidence. The Crystal Cedar Environmental Analysis must be restarted with a fair and objective evaluation of public comments. The new process must include an objective evaluation of Nordic ski trails. The FNF should engage the Nordic ski community early in the process.