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Organization:

Title:

Comments: Cibola Plan Revision Comments

Attn: Forest Planner

Cibola National Forest and National Grasslands

Re: Needs for Change Statements and Proposed Forest Plan

Dear Sir or Madam:

We have submitted several comments regarding the Draft Assessment Report and Need-to-Change Statements for the Forest plan revision:

- \* Response (October 29, 2012) to scoping announcement (suggesting actions to relocate the CDNST off roads where practicable, providing adequate water sources, considering land acquisitions or exchanges to improve the trail's setting, and protecting the scenic qualities of the trail's viewscape).

- \* Comment Form (December 28, 2012) referring to policies set out in the 2009 CDNST Comprehensive Plan and Forest Service Manual 2353.44b, including specific reference to the "most important potential relocation, between Grants and lower Bonita Canyon (over San Rafael Mesa)."

- \* Comments submitted on July 25, 2014 addressing in greater detail the draft assessment report and recommending, with supporting rationales, (1) a need to relocate the CDNST off roads and improve the Trail's location, and (2) implementation of the 2009 Comprehensive Plan and the policies set out in the Forest Service Manual.

Each of these submissions was sent to: [cibolamtnsplanrevision@fs.fed.us](mailto:cibolamtnsplanrevision@fs.fed.us) <<mailto:cibolamtnsplanrevision@fs.fed.us>> s . We incorporate them herein by reference.

In addition, the Forest will need to address the newly-released directives in FSH 1909.12, Chapter 20, including sec. 24.43 - National Scenic and Historic Trails.

The current proposed action responds to both of our recommended need-to-change statements with the brief recognition (IV.D.c.) that "there is a need for the revised plan to provide direction on the Continental Divide National Scenic Trail (CDNST) consistent with the 2009 Continental Divide National Scenic Trail Comprehensive Plan." This should be modified to require direction "consistent with the 2009 Continental Divide National Scenic Trail Comprehensive Plan and applicable Forest Service directives" - to which we refer to FSH 1909.12, ch. 20, sec. 24.43 and FSM 2353.44b. We would concur with this statement, as modified, so long as the assessment includes the topics of concern in those documents and indicates how they will be addressed in the revised forest plan. We identify several of these topics in the following discussion.

- \* The review of the Scenery Management System notes that the Sawtooth Mountains have been identified as Concern Level 1 through the SMS process. The assessment should also recognize that the CDNST is also Concern Level 1, with a scenic integrity objective of high or very high, depending on the trail segment. FSM

2353.44b7. (See CDTS comments regarding p. 166, now p. 169.) The desired visual quality objectives (Figure 73) need to be revised, especially with regard to the recommended relocation across San Rafael Mesa. Consistent with the scenery management system, the assessment should recognize that visual quality objectives within the viewshed of the CDNST need to be respected not only for elements in the foreground of the CDNST itself, but for elements that are situated in more remote management areas and yet can be viewed from the Trail. (The "Trail," in this regard, includes not only a CDNST management area established by the revised Forest plan, but also any location that is reasonably likely to be selected as a modified route for the CDNST.)

\* The assessment appropriately emphasizes the need to identify and relocate a permanent, high-quality route for the CDNST off of roads. (See our comments with respect to pp. 170-171, now pp. 173-174). A very high priority is the excellent Sawtooth Mountains section that is described in the assessment report. (The revised forest plan should include a desired condition to reroute the CDNST along this alignment, preferably with an objective to do so within a specified time frame.) Also, in order to avoid the present unsatisfactory highway walk, the Trail should be relocated across San Rafael Mesa (largely bypassing Bonita and Zuni Canyons) with a right-of-way, if obtainable, between the eastern border of the ranger district and Grants. In addition, the revised plan should consider removing the section north of Antelope Flats from roads - but until this can be accomplished, no upgrade to road standards should be allowed there. While the Forest plan itself should establish a provisional management area for the Trail, the CDNST unit plan (FSM 2353.44b) may provide a forum for evaluating some realignments.

\* The discussion of user conflicts associated with mountain bike use alludes to potential conflicts with hikers on the CDNST. The revised plan should recognize that bicycling is not to be allowed on the CDNST as a matter of course. Backpacking, nature walking, day hiking, horseback riding, and several other activities are expressly stated to be compatible with the nature and purposes of the CDNST, but bicycle use may only be allowed with a particularized determination that the use will not substantially interfere with the nature and purposes of the CDNST. FSM 2353.44b.8,10. As decisions regarding management of the individual trails would require specific decision-making, we expect that this would be a matter for resolution in the CDNST unit plan.

\* As mentioned in our comments (on p.201, now p. 208), the description of the CDNST includes the statement that "trail users are responsible to bring their own water as there is no potable water along the trail." This is incorrect, as trail users are to be informed that "all water along the trail must be treated to insure that it is potable." Comprehensive Plan, p. 22. The assessment should therefore provide that users "are responsible to bring their own water, or otherwise treat water occurring along the trail, to insure that it is potable." The plan should provide access to, and protection of, water sources at reasonable intervals (see FSM 2353.44b.9). Snooter Spring on San Rafael Mesa is one possibility. Others, such as Ojo Piedra (west of Mount Taylor), should also be referenced in the EIS examination of water availability.

\* Figure 86 depicts current management areas of the Cibola National Forest. The Forest Plan should modify the definition of these areas to include a new one specifically for the CDNST. FSM 2353.44b.2. If the MA is not defined geographically in the Plan itself, it should be made clear that any interim designations are subordinate to a unit plan's direction with respect to the CDNST management area. (Management decisions relating to the CDNST that are deferred to project-level review should be made promptly as part of the CDNST unit plan.) Previous comment regarding p. 216, now p. 224.

\* Among the lands desirable for acquisition is "land [that] has high recreation potential." As noted at p. 226 (now p. 234), there may be cases where the acquired land [perhaps a narrow easement] may have limited recreation value itself, but may provide access to Forest lands that would provide excellent recreation. (This might be the case in the Mt. Taylor RD between Grants and San Rafael Mesa, and in the Magdalena RD between Pie Town and the Sawtooth Mountains.). A suggested revision is: "The land has high recreation

potential or provides access to land having high recreation potential."

\* The list of partners (p. 229, now p. 237) should be modified to omit the Continental Divide Trail Alliance, which is no longer in operation.

We would welcome the opportunity to review our comments with you in the course of your preparation of a proposed revised forest plan.

Respectfully submitted,

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