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Twin Lakes Vegetation Management Project #59642

I appreciate this opportunity to comment on the Twin Lakes Vegetation Management Project. My main concerns are protecting Continental Divide National Scenic Trail (CDNST) qualities and values and Semi-Primitive Recreation Opportunity Spectrum (ROS) settings.

*The scoping letter states, "The project is mainly located within the watershed adjacent to the Twin Lakes Reservoir. The reservoir provides water to Colorado Springs, Aurora and other municipalities. Wildfires that have occurred adjacent to other reservoirs have damaged infrastructure and downstream improvements, while increasing erosion and sedimentation into the reservoirs. Current forested stands within the project area have a high dead and down component and are susceptible to high intensity wildfire. There is a need to mitigate the potential impacts from high intensity wildfire to the watershed, reservoir, historic heritage properties, and other resources."*

A consideration not addressed in the scoping notice is the need to protect CDNST qualities and values. The project must not result in a substantial interference with the CDNST nature and purposes as well as degrade desired ROS settings.

In general, I am supportive of prescribed fire that would be utilized where appropriate to reduce fuels, and using ignition of both ground based and aerial ignition prescribed fire. Important to this project is the Colorado Roadless Rule. A basic CDNST effects assumption in the Roadless Rule decision was that CDNST Comprehensive Plan and FSM 2353.4 direction would be more controlling than the Roadless Rule when implementing projects within the CDNST management corridor.

*The Colorado Roadless Rule FEIS on pages 267-268 states, "Congress amended the National Trails System Act with Public Law 95-625, on November 10, 1978, to establish and designate the Continental Divide National Scenic Trail (CDNST), which traverses approximately 800 miles through Colorado along the Continental Divide. The Comprehensive Plan for the CDNST, amended on September 28, 2009, describes that the nature and purposes are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor. Under forest plan direction, the trail is managed to provide for primarily primitive and semi-primitive non-motorized recreation opportunities and settings, and a scenic integrity level of high to very high. The direction would*

*be followed under any of the four alternatives... None of the alternatives would directly affect the scenic values for which the CDNST was designated because management direction contained in the statutes associated with this designated trail overrides any existing forest plan direction or rule....”*

Vegetation management that requires temporary or permanent roads and mechanical harvesting equipment within the CDNST corridor must be carefully planned and very limited if the CDNST qualities and values are to be protected. Such actions should only be considered after the plan is amended or revised to address policy requirements to establish a CDNST Management Area with associate plan components that protect CDNST qualities and values (FSM 2353.04i and FSM 2353.44). The analysis should ensure that all BLM public lands within the project area are identified and that the National Trail direction in BLM MS-6280 is followed, if relevant.

At this time, the Forest Service and BLM should modify the proposed action or evaluate an alternative that avoids permanent and temporary road construction and reconstruction within the CDNST management corridor as shown on the map in **Appendix A** (CDNST Area of Concern Area).

The Environmental Assessment must be site-specific and not rely on a Condition Based Management approach with identified design features and sideboards to protect resources. This approach is not reliable for protecting CDNST qualities and values and for maintaining Semi-Primitive ROS setting characteristics.

The Environmental Assessment should utilize the ROS and Scenery Management Systems in the analysis to help ensure that the NEPA assessment accurately describe the affected environment and expected outcomes from each alternative. CDNST substantial interference analyses and determinations need to be rigorous and be addressed as part of the cumulative impacts. Map elements need to be discernable using a high-contrast color scheme. In addition, geospatial data should be available that correspond to proposed roads and mechanical treatment units.

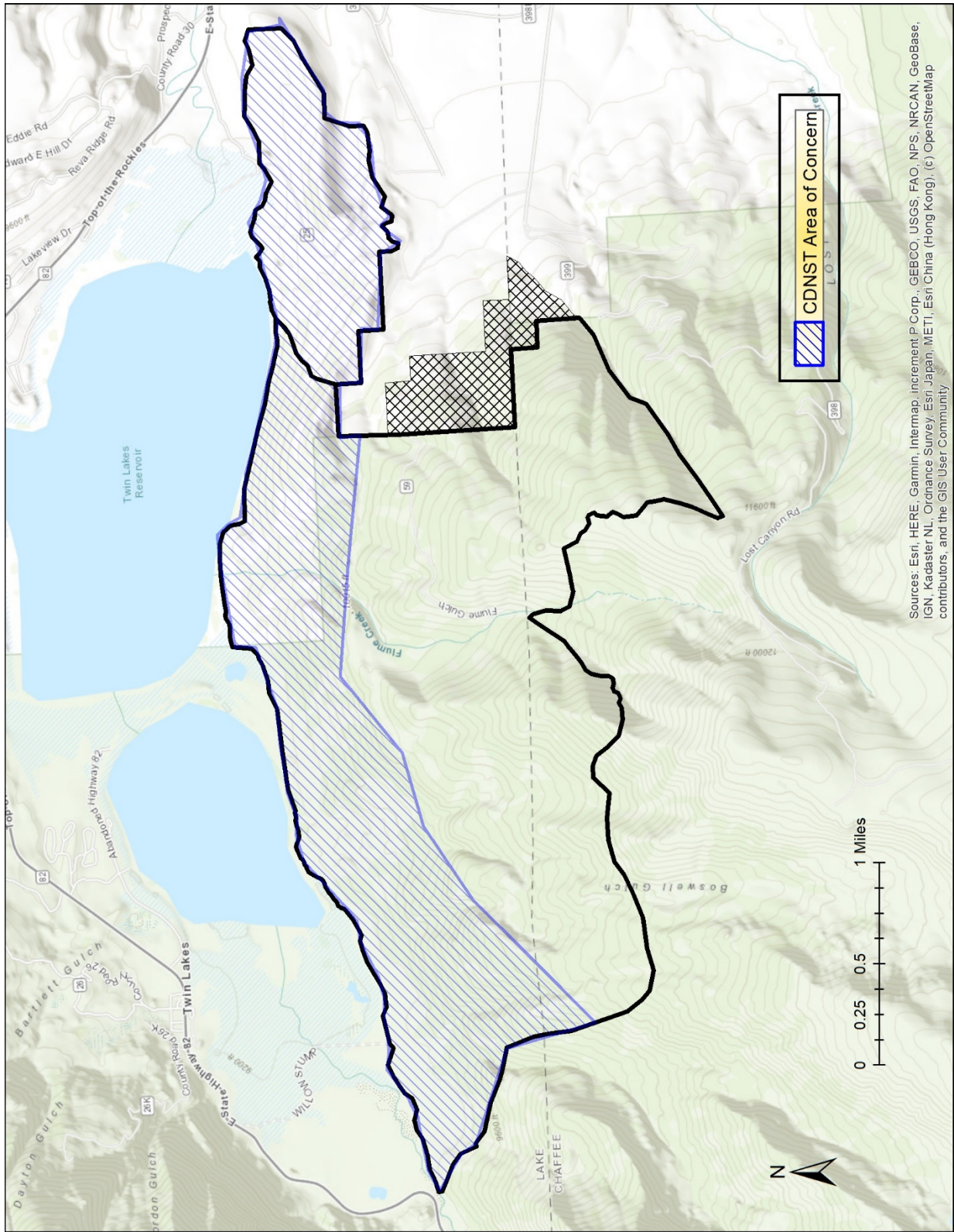
These scoping comments also include information found in a CDNST Planning Handbook (**Attachment A**), CDNST Comprehensive Plan (**Attachment B**), FSM 2350.4 policy direction for the CDNST (**Attachment C**), and the ROS Book (**Attachment D**).

Please add me to the mailing list for this project.

Thank you for accepting and considering these comments.

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**Appendix A – CDNST corridor in the vicinity of Twin Lakes.**



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community