

Tristram Post, Saguache District Ranger
Attn: Lujan Pass Timber Management Project
46525 State Hwy 114
Saguache, CO 81149

July 23, 2019

Comments submitted via comments-rocky-mountain-rio-grande-saguache@fs.fed.us

Dear Mr. Post,

The following are comments regarding the proposal to harvest approximately 722 acres of lodgepole pine, Engelmann spruce, Douglas-fir, subalpine fir and aspen within the Lujan Pass Area. The scoping notice describes that, “approximately 245 acres of the proposed harvest area would implement patch clearcutting within the total harvest area of 722 acres. Within each patch clearcut, all trees would be considered for harvest, unless retention is otherwise specified. The proposed harvest activity is consistent with Land and Resource Management Plan direction, and would yield an estimated 3,000 hundred cubic feet (CCF) of saw timber utilizing ground-based harvesting systems. Up to 1.0 mile of temporary road could be constructed or reconstructed to facilitate harvest operations. Other activities associated with the proposed action may include road maintenance and repair, pile burning, and temporarily opening gated roads for public firewood gathering after harvest.”

The proposed action directly affects the Continental Divide National Scenic Trail (CDNST) corridor, which brings CDNST considerations into the scope of the NEPA analysis. This is due to potential direct, indirect, and cumulative impacts of past actions and new proposals that may substantially interfere with the nature and purposes of the CDNST. As such, management discretion is limited by the requirements of the National Trails System Act (NTSA) as implemented through Executive Order 13195, 2009 CDNST Comprehensive Plan, FSM 2353.4, FSH 1909.12, and Federal Register Notice dated October 5, 2009 (74 FR 51116).

Management practices along the CDNST existing and high potential route segments must provide for the protection of the nature and purposes of this National Scenic Trail. The proposed action should be modified to avoid timber production and road improvement activities within the CDNST corridor. This avoidance area is depicted on a map in **Appendix A**. If you would like to consider the proposed action as presented, then an alternative needs to be developed and analyzed that clearly provides for the nature and purposes of the CDNST, which includes protecting scenic values, promoting more primitive Recreation Opportunity Spectrum settings, and conserving wildlife habitat (e.g., providing for Canada lynx connectivity).

The FR Notice of final amendments to the CDNST Comprehensive Plan and final directives states, “The final amendments to the CDNST Comprehensive Plan and corresponding directives will provide guidance to agency officials implementing the National Trails System Act. The final amendments are consistent with the nature and purposes of the CDNST identified in the 1976 CDNST Study Report and 1977 CDNST Final Environmental Impact Statement adopted by the Forest Service in 1981 (40 FR 150). The final amendments and directives will be applied through land management planning and project decisions following requisite environmental analysis” (Federal Register, October 5, 2009 (74 FR 51116)).

I have attached comments that were submitted on the Draft Plan and DEIS, which should assist in the development of alternatives for this project proposal – **Attachment A**. In addition and for planning team reference, CDNST planning and management information is presented in the attached CDNST Planning Handbook – **Attachment B**.

Thank you for considering these comments.

Greg Warren
P.O. Box 2322
Frisco, CO 80443

cc: Tom Malecek

Appendix A – Lujan Pass Timber Management Project Avoidance Area

