

District Ranger
Shoshone National Forest
Wind River Ranger District
1403 West Ramshorn
Dubois, WY 82513

April 7, 2018

comments-rocky-mountain-shoshone@fs.fed.us

RE: Lava Mountain Project #52894

Please accept the following comments regarding the proposal to manage forest vegetation in the Lava Mountain area within the Shoshone National Forest. These comments are specific to the planning and management of the Continental Divide National Scenic Trail (CDNST).

The proposed action directly affects the CDNST, which brings CDNST considerations into the scope of the Environmental Assessment. 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 (40 CFR 1508.25). 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 be managed to provide for the protection of the nature and purposes of this National Scenic Trail. The proposed action needs to be modified to be consistent with the NTSA. However, if the responsible official wants to consider the proposed action as presented, than an alternative must be developed and analyzed that clearly provides for the nature and purposes of the CDNST.

Proposed Action Modification / Alternative to the Proposed Action

The proposed action should be modified or an alternative developed that is consistent with the Forest Plan theme and desired conditions for the CDNST. The theme is described as, "Management of the Continental Divide National Scenic Trail is consistent with the Continental Divide National Scenic Trail Comprehensive Plan (USDA Forest Service 2009). That plan describes the nature and purposes of the trail as, "... to provide high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor... The Trail provides a high quality scenic, primitive hiking and pack and saddle stock experience... Roads and motorized trails are not present except at designated crossings. The Trail corridor is characterized by a predominantly natural appearing environment. Improvements such as trailheads, trails, signs, bridges, and fences that enhance the recreation opportunities may be present. Evidence of past and present resource management may exist, but blends with the natural appearance of the landscape. Vegetation alterations may be

present to enhance viewing opportunities... Ecological processes such as fire, insects, and diseases exist. The potential to view wildlife is high.”

The approved management practices must provide for protecting the CDNST corridor along the existing and high potential route segments as depicted in the **Appendix** and presented in the **attached** Google Earth KMZ file. Management activities along the existing CDNST travel route and high potential route segments must be consistent with Forest Plan standards, including “Projects in foreground areas of scenic byways, national scenic trails, or designated wild and scenic rivers shall be designed to meet the scenic integrity objective of at least high (SCEN-STAND-01).” Management practices must strive to maintain or restore the recreation setting along the CDNST consistent with National Scenic Trail values.

Comprehensive CDNST Planning

Extensive CDNST planning information is found in an **attachment** that is available as a reference and for the administrative record. The information in the following sections of the CDNST Planning Handbook would be most relevant to the proposed Lava Mountain project:

- Chapter II. Nature and Purposes of the CDNST
 - F. Public Involvement in the Formulation of Comprehensive Plan Policy
 - G. Nature and Purposes Policy
- Chapter III. Land Management Planning
 - B. Rights-of-Way and National Trail Management Corridor
 - C. Development and Management
 - D. CDNST Comprehensive Planning
 - F. Scenery Management System and Recreation Opportunity Spectrum Relationship
 - H. Substantial Interference
 - I. Forest Service Planning Considerations
- Chapter IV. Legislative History and Policy
 - E. Study Report, Comprehensive Plan, and Policy for the CDNST
- Chapter V. Comprehensive Planning Relationship to NEPA
 - A. National Scenic Trail Planning and NEPA
 - B. Establishment of the Purpose and Need for Action
 - C. Identify Proposed Action and a Reasonable Range of Alternatives
 - D. Affected Environment
 - E. Analyze the Effects of the Proposed Action and Alternatives
- Chapter VII. Glossary

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 encourage the Shoshone NF and Bridger-Teton NF staff to collaborate in finding a permanent location for the CDNST management corridor. Most of the routes identified on the map in the **appendix** were identified by Shoshone NF staff as CDNST high potential route segments.

Thank you for accepting and considering these comments. If you have any questions, please contact me at nstrail@comcast.net.

Greg Warren
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cc: Tod Stiles, Tim Farris, Mike LaFrentz, Rob Robertson, and Brenda Yankoviak

Attachments:

Google Earth KMZ file of high potential route segments
CDNST Planning Handbook

Appendix – CDNST High Potential Route Segments

