

Shoshone National Forest  
 Forest Plan Comments  
 808 Meadow Lane Avenue  
 Cody, WY 82414  
[shoshone\\_forestplan@fs.fed.us](mailto:shoshone_forestplan@fs.fed.us)

Following are comments and recommendations on the Draft Shoshone Forest Plan and DEIS.

**Background**

The 1982 planning rule describes in 36 CFR Part 219.2 that the requirements for additional planning for special areas shall be met through Forest Plans. For the CDNST, agency wide direction for Land Management Plans is found in 2353.4 and addressed in the Federal Register, on October 5, 2009 (Volume 74, Number 191).

FSM 2353.42 describes as policy: “Administer National Scenic and National Historic Trail corridors to be compatible with the nature and purposes of the corresponding trail.... The nature and purposes of the CDNST 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.”

FSM 2353.44b – “Continental Divide National Scenic Trail

1. The land management plan for an administrative unit through which the CDNST passes must provide for the nature and purposes of the CDNST (FSM 2353.42) and, in accordance with the programmatic requirements of the National Trails System Act, as amended (16 U.S.C. 1244(f)), and the CDNST Comprehensive Plan, as amended, must:
  - a. Except where the CDNST traverses a wilderness area and is governed by wilderness management prescriptions (36 CFR Part 293), establish a management area for the CDNST that is broad enough to protect natural, scenic, historic, and cultural features;
  - b. Prescribe desired conditions, objectives, standards, and guidelines for the CDNST; and
  - c. Establish a monitoring program to evaluate the condition of the CDNST in the management area.”

**CDNST Draft Forest Plan and DEIS Review and Comment**

The following are specific comments on parts of the draft Plan and DEIS:

<b>Section, Page</b>	<b>Issues and Comments</b>	<b>Recommendations</b>
Plan, Page 17	Continental Divide National Scenic Trail goal is incomplete.	Quote the direction found in the Comprehensive Plan and FSM 2353.42.
Plan, Page 128	Roads and trails suitable uses are in conflict the 2009 CDNST Comprehensive Plan and FSM 2353.4	Modify the direction to be identical to the guidance found in FSM 2353.44b parts 10 and 11.
Plan, Page 172	Management Area 3.6A – The setting description inappropriately relies on a 1998	The revised Shoshone Plan needs to implement the direction in the 2009 CDNST Comprehensive Plan Chapter III (E), and FSM 2353.42 and 2353.44(b)

	<p>CDNST related decision.</p> <p>The 1998 Environmental Assessment implemented flawed direction that is found in the 1985 Comprehensive Plan. As discussed in 74 FR 51116, the 1985 CDNST Comprehensive Plan was inconsistent with the National Trails System Act, CDNST Study Report, and the associated Final Environmental Statement.</p>	part 1.
Plan, Page 173	Standards for Special Uses do not support the Goals.	Standards need to be established that support the nature and purposes of the CDNST.
Plan, Page 173	Recreation Standards are inconsistent with the Comprehensive Plan and Policy.	The revised plan needs to address the direction in FSM 2353.44(b)(1).
Plan, Page 174	Recreation Goal 2 does not provide for the nature and purposes of the CDNST.	The revised Shoshone Plan needs to implement the direction in the 2009 CDNST Comprehensive Plan Chapter III (E), and FSM 2353.42 and 2353.44(b) part 1.
Plan, Page 174	Guideline 4 is not reflective of the direction in the Comprehensive Plan and FSM.	Scenery must be addressed as a Standard. The revised Shoshone Plan needs to implement the direction in the 2009 CDNST Comprehensive Plan Chapter III (E), and FSM 2353.42 and 2353.44(b) part 1.
<b>Section, Page</b>	<b>Issue or Comment</b>	<b>Recommendations</b>
DEIS, Page 8	CDNST is not addressed as a Congressionally Designated Area.	The CDNST needs to be address in this section as congressionally designated area.
DEIS, Page 30	The descriptions of the alternatives do not reflect providing for principally a primitive and semi-primitive nonmotorized corridor for the CDNST.	Implement the FSM 2353.44(b)(1) for the various corridors that are identified on Map 41.
DEIS, Page 47	The section on “alternatives considered but eliminated from detailed study” mistakenly identifies that prescribing a nonmotorized CDNST corridor need not be developed.	Follow the direction found in the 2009 CDNST Comprehensive Plan Chapter III (E) and FSM 2353.42 and 2353.44(b) for establishing a Management Area for CDNST.
DEIS, Page 475	Executive Order 13195 is not listed.	Add to EO 13195.
DEIS, Page 479	The CDNST description inappropriately relies on 1998 EA and Decision. As discussed in 74 FR 51116, the 1985 CDNST Comprehensive Plan is	The revised Shoshone Plan needs to implement the direction in the 2009 CDNST Comprehensive Plan Chapter III (E), and FSM 2353.42 and 2353.44(b) part 1.

	inconsistent with the National Trails System Act, CDNST Study Report, and the associated Final Environmental Statement.	
DEIS, Page 480	FSM 2353.44 references are incomplete.	The revised plan and implementation need to follow the direction in FSM 2353.42 and 2353.44(b) part 1.
DEIS, Page 496	The effects are not disclosed for other potential CDNST MA corridors—see map 41.	The proposed CDNST MA 3.6A direction does not provide for the nature and purposes of the CDNST and needs to be modified.
DEIS, Page 506	CDNST cumulative effects discussion is based on MA 3.6A direction that is inconsistent with the National Trails System Act resulting in a range of alternatives that do not adequately address locating and the management of the CDNST.	A Supplemental Plan and DEIS may need be completed in order to address the direction the 2009 CDNST Comprehensive Plan Chapter III (E), and FSM 2353.42 and 2353.44(b).
DEIS, Page 558	CDNST is not discussed under scenery resources.	Add a CDNST discussion to this section.

## **Recommendation for Management Area 3.6A**

### **Locating the CDNST Corridor**

I recommend that the Management Area encompass the high potential for the route being located close to the following points: Sheridan Pass, Lava Mountain, Two Ocean Mountain, Togwotee Pass, and Brooks Lake. The boundary of the MA should follow topographic features to the extent possible, while being at least one-half mile wide on each side of the CDNST travel route.

### **MA 3.6A Desired Conditions**

The MA provides high-quality scenic, primitive hiking and horseback riding opportunities and conserves natural, historic, and cultural resources.

A variety of compatible non-motorized recreation opportunities are provided. Access to the CDNST is provided primarily by foot, horseback, and other non-motorized means.

Concentrations of users are low and opportunities for solitude and exercising outdoor skills will be present. Improvements such as trailheads, trails, signs, and bridges that enhance the recreation opportunities may be present.

The MA is characterized by a predominantly natural appearing environment. However, evidence of past and present resource management may exist. Vegetation alterations may be present to enhance viewing opportunities and to maintain vegetative diversity. Ecological processes such as fire, insects, and disease exist.

The CDNST Comprehensive Plan and FSM 2353.4 are used to guide the development and management of the Trail.

**Goals for MA 3.6A**

<b>Description</b>
Provide high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor (CDNST Comprehensive Plan).

**Objectives for MA 3.6A**

<b>Description</b>
Complete the CDNST travel route through the MA.

**Standards for MA 3.6A**

<b>Description</b>
<b>Scenery</b>
The CDNST travel route is a Concern Level 1 Travelway. All management activities in the foreground are to meet the Scenic Integrity Objective of High or Very High. The Scenic Integrity Objectives in the middleground viewshed is to be High, Very High, or Moderate.
<b>Recreation</b>
Manage for the ROS Class of Primitive and Semi-Primitive Non-Motorized, except motor vehicle use is allowed if such use is in accordance with the CDNST Comprehensive Plan direction (Chapter IV.6).
<b>Special uses (Lands and Recreation)</b>
Activities, uses, and events that would require a permit shall not be authorized unless the activity, use, or event contributes to achieving the nature and purposes of the CDNST.
<b>Travel Routes</b>
Construction, reconstruction, and maintenance of the CDNST travel route shall be for the designed use of Trail Class 3, Pack and Saddle Stock.
Prohibit National Forest System road construction and reconstruction unless there is a valid existing right. Existing National Forest System developed roads are exempted.
<b>Minerals</b>
Mineral leases are to include stipulations for no surface occupancy.
Permits for the removal of mineral materials are not issued.

**Guidelines for MA 3.6A**

<b>Description</b>
<b>Vegetation</b>
Vegetation may be altered through timber harvest or fire (prescribed or wildfire use) to enhance recreation opportunities, to provide vistas to view surrounding areas, and to conserve natural,

historic, and cultural resources.
Vegetation may be altered to maintain or improve threatened, endangered, and sensitive species habitat.
<b>Minerals</b>
Consider withdrawals for areas with a history of locatable mineral findings.
<b>Range</b>
Commercial livestock may exist with rangeland management structures evident. Best Management Practices are implemented.
<b>Visitor Services</b>
Partners and volunteers assist in CDNST programs.

Sincerely,

G.A. Warren  
22 S Juniper Ct  
Golden, CO 80401-5002