

## Greg Warren

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**From:** Greg Warren <NSTrail@comcast.net>  
**Sent:** Saturday, March 18, 2017 4:54 PM  
**To:** mglossa@fs.fed.us  
**Cc:** NSTrail@comcast.net; eherrmann@fs.fed.us  
**Subject:** SCNF Forest Plan Revision - BDNF CDNST "National Trail Management Corridor" Amendment  
**Attachments:** cdnst\_planning\_handbook\_03142017.pdf; cdnst\_corridor\_salmon\_revision\_03182017.pdf; cdnst\_ntmc\_03182017.kmz

Dear Ms. Glossa,

I am contacting you to suggest that the Beaverhead-Deerlodge NF participate in the revision of Salmon-Challis Forest Plan process to extent necessary to address planning for the Continental Divide National Scenic Trail (CDNST) along the Beaverhead-Salmon National Forests common boundary. The need to amend the BDNF plan for the purpose of the CDNST was partially addressed in a LRMP decision on FEIS appeals, dated Oct. 30, 2009:

One appeal contention regarding the Continental Divide National Scenic Trail (CDNST) was received and is addressed in Attachment 2: Issues Reviewed and Decisions Affirmed. However, on September 28, 2009, the CDNST Comprehensive Plan was amended, with an effective date of November 4, 2009. The Revised Plan referred to an amended Comprehensive Plan, which in fact had not been amended at the time the ROD was issued. No correction to that wording is required since the effective date of the amendment is imminent. However, subsequent to the effective date of the amendment, the Revised Plan direction should be reviewed to determine whether it is consistent with the Comprehensive Plan amendment (and related FSM 2350 direction), and appropriate action taken if necessary.

I hope that you and BDNF management team will consider this collaboratively NEPA planning effort with the Salmon NF to the benefit of the CDNST. Please let me know if this is something that the BDNF may undertake and if a Supplemental Information Report was prepared to address the 2009 appeal decision. If a SIR was prepared, I would appreciate receiving a copy of the report.

Thank you,  
Greg Warren

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**From:** Greg Warren [<mailto:NSTrail@comcast.net>]  
**Sent:** Wednesday, March 15, 2017 8:13 PM  
**To:** [scnf\\_plan\\_rev@fs.fed.us](mailto:scnf_plan_rev@fs.fed.us)  
**Subject:** SCNF Forest Plan Revision - National Trails Assessment Comments

The following comments address the SCNF Forest Plan revision assessment and is submitted as requested on the Salmon-Challis NF website: "The Assessment Workbook is useful if you are interested in providing feedback on the assessment. Your input will be accepted at any time, but it will be most helpful if we receive it by March 31, 2017. Email ideas or questions to [scnf\\_plan\\_rev@fs.fed.us](mailto:scnf_plan_rev@fs.fed.us)."

These comments are specific to assessing the status of protecting National Trails that pass through the Salmon National Forest, including the Continental Divide National Scenic Trail, Nez Perce National Historic Trail, and

Lewis and Clark National Historic Trail. Designated areas are specific areas or features within the plan area that have been given a permanent designation to maintain its unique special character or purpose. The assessment should, in part, address the following guidance (FSH 1909.12 part 14):

1. Types, purposes, and locations of established designated areas within the plan area. The Responsible Official should use a map to identify these locations, unless the location of the designated area must remain confidential for resource protection.
2. Range of uses, management activities, or management restrictions associated with the established designated areas in the plan area.
3. Existing plans for the management of established designated areas within the plan area, such as comprehensive plans for national scenic or historic trails.

The assessment should evaluate the degree to which current management direction is protecting the values for which each National Trail was designated, including protecting cultural landscapes, recreation settings, scenic integrity, and addressing the conservation purposes of each National Trail. The assessment will help guide the development of the revised plan following processes identified in FSH 1909.12 part 24. In addition, I encourage the planning team to reach out to National Trail managers and principle National Trail volunteer organizations to seek their active participation throughout the revision process.

The focus of comments found in this mailing are specific the Continental Divide National Scenic Trail. For reference and for the planning record, I have attached the latest version of a CDNST Planning Handbook, which addresses many aspects of planning for this National Scenic Trail. The CDNST Planning Handbook will continue to be updated as needed on the [NSTrail.org](http://NSTrail.org) website.

To assist with public review of the forthcoming NEPA proposed action, please post at the appropriate time geospatial data. Posted data for the proposed action should include the following geospatial information:

- Administrative Boundaries (FSH 1909.12 22.2)
- Land Ownership (FSH 1909.12 22.2)
- Designated Areas, including Recommended Wilderness, Wilderness Study Areas, Eligible Wild & Scenic Rivers, Inventoried Roadless Areas, and the extent of the CDNST management corridor/rights-of-way to be established (FSH 1909.12 22.2 and 24)
- Recreation Opportunity Spectrum Classes to be established – Summer and Winter (FSH 1909.12 22.2 and 23.23a)
- Scenic Integrity Objectives to be established (FSH 1909.12 22.2 and 23.23f)
- Lands that May be Suitable for Timber Production FSH 1909.12 Chapter 60)
- CDNST travel route as an independent data layer (FSH 1909.12 23.231)
- NFS roads and trails with attribute data, including existing [road maintenance levels](#) and [trail travel route fundamentals](#) such as Designed Use, Managed Use, and Trail Class (FSH 1909.12 23.231)

I encourage the SCNF Forest Supervisor to address the planning for the CDNST in collaboration with the Beaverhead-Deerlodge Forest Supervisor where the CDNST corridor is shared. The SCNF Plan would be revised, while the Beaverhead-Deerlodge Plan would be amended along the common forest boundary to address the requirements of the CDNST Comprehensive Plan and FSH 1909.12.

The following is a brief introduction to National Trails, which may help with the understanding of the purposes of these special areas and the initiation of the assessment process:

The Secretary of the Interior in 1965 directed the Bureau of Outdoor Recreation to take the lead in conducting a nationwide trails study. This was in response to President Johnson's "Natural Beauty" message of February 1965 in which he called for development and protection of a balanced system of

trails in cooperation with state and local government and private interests. In part, the President said, "we can and should have an abundance of trails for walking, cycling, and horseback riding, in and close to our cities. In the backcountry we need to copy the great Appalachian Trail in all parts of America."

The nationwide trails study led to publication of a report in 1966 entitled "Trails for America." The report called for federal legislation to foster the creation of a nationwide system of trails. Earlier that year the Secretary of the Interior had already proposed such legislation to Congress. The report and the legislation proposed three categories of trails for the nationwide system—national scenic trails and two other categories that were different from what eventually came to pass. The report heavily emphasized national scenic trails and the role that they should play in meeting the nation's needs for trail recreation. The Appalachian Trail was to be the first national scenic trail. The report proposed three other national scenic trails—Pacific Crest, Continental Divide, and Potomac Heritage—and identified five other routes that exhibited high potential—Lewis and Clark, Oregon, Santa Fe, Natchez Trace, and North Country. Congress passed the National Trails System Act and the president signed it into law on Oct. 2, 1968. The Act created two congressionally designated areas the Appalachian National Scenic Trail and the Pacific Crest National Scenic Trail.

As envisioned in "Trails for America," national scenic trails are to be very special: "A standard for excellence in the routing, construction, maintenance, and marking consistent with each trail's character and purpose should distinguish all national scenic trails. Each should stand out in its own right as a recreation resource of superlative quality and of physical challenge." According to the Act, national scenic trails "will be extended trails so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of nationally significant scenic, historic, natural, and cultural qualities of the area through which such trails may pass." National scenic trails are located so as to represent desert, marsh, grassland, mountain, canyon, river, forest, and other areas, as well as landforms which exhibit significant characteristics of the physiographic regions of the Nation. The corridor will be normally located to avoid established uses that are incompatible with the protection of a trail in its natural condition and its use for outdoor recreation.

Congress amended the National Trails Systems Act in 1978 to create the category of national historic trails. At the same time, it designated the Oregon, Mormon Pioneer, Lewis and Clark, and Iditarod (Alaska Gold Rush) trails as national historic trails. Like national scenic trails, national historic trails can only be authorized and established by Congress and are assigned to either the Secretary of the Interior or the Secretary of Agriculture with most of the same administrative authorities as for national scenic trails. To qualify as a national historic trail, a route must have been established by historic use. It must be nationally significant as a result of that use—it must have had a far-reaching effect on broad patterns of American culture (including Native American culture). It must also have significant potential for public recreational use or historic interest based on historic interpretation and appreciation. National historic trails are extended trails which follow as closely as possible and practicable the original trails or routes of travel of national historic significance. National historic trails purpose is the identification and protection of the historic route and its historic remnants and artifacts.

Corridors associated with national scenic trails and the high priority potential sites and segments of national historic trails are protected to the degree necessary to ensure that the values for which each trail was established remain intact. National scenic and national historic trails may contain campsites, shelters, and related-public-use facilities. Other uses along the trail, which will not substantially interfere with the nature and purposes of the corresponding trail, may be permitted in limited situations.

The Forest Service, Bureau of Land Management, and National Park Service recognizes the valuable contributions that volunteers and private, nonprofit trail groups have made to the development and maintenance of the Nation's scenic and historic trails. In recognition of these contributions, it is a purpose of the agencies to encourage and assist volunteer citizen involvement in the planning, development, maintenance, and management of the national scenic and historic trails.

Thank you for considering these comments and I look forward to participating throughout the revision process.