

File Code: 2350

Date: JAN 12 2012

Kristin Yannone
Project Manager
Lander Field Office
Bureau of Land Management
1335 Main Street
Lander, WY 82530

Dear Ms. Yannone:

I am submitting comments on the Lander Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS) in response to the Bureau of Land Management Federal Register Notice that was published on September 9, 2011 (76 FR 55939). These comments are specific to the planning and management of the Continental Divide National Scenic Trail (CDNST) for which the Rocky Mountain Region of the Forest Service has the responsibility for coordinating matters concerning the study, planning, location, and operation.

The final RMP needs to incorporate the direction contained within the 2009 CDNST Comprehensive Plan, which replaced the 1985 CDNST Comprehensive Plan. The amended CDNST direction is described in a Federal Register Notice that was published on October 5, 2009 (74 FR 51116). The 2009 CDNST Comprehensive Plan was transmitted by Acting Deputy Chief Richard Sowa to Director Robert Abbey in October 2009.

The following are specific points to consider in the development of the final RMP and EIS:

- General: In the development of the final RMP direction, I would appreciate your consideration of the guidance described in the attachment for prescribing direction for the CDNST.
- Section 1.1.2: The purpose and need section of the Final EIS needs to address the 2009 CDNST Comprehensive Plan as significant new information, and identify the need to apply the CDNST direction to the RMP.
- Sections 2.6.2.8 and 2.6.4.8: I fully support the integration of the CDNST management direction when prescribed in conjunction with direction for National Historic Trails and Areas of Critical Environmental Concern.
- Section 3.6.6: The Forest Service continues to use the Recreation Opportunity Spectrum approach for inventory and prescription purposes. However, the new BLM recreation settings process appears to be an acceptable approach for establishing management direction for the CDNST.
- Section 4.10.6: The DEIS describes for each alternative the expected developments (other uses) along the CDNST. The Final EIS should assess and disclose whether such developments would substantially interfere with the nature and purposes of the CDNST.



Please contact Greg Warren, CDNST Administrator, at 303-275-5054 or gwarren@fs.fed.us, if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. W. McCusker', written in a cursive style.

DANIEL W. MCCUSKER
Acting Deputy Regional
Forester, Operations

cc: Greg Warren, Cheryl Chatham, Lesly Smith

Attachment

Attachment – Continental Divide National Scenic Trail SRMA

Recommendations for the Lander RMP CDNST Special Recreation Management Area (SRMA) are described in the following table.

<p>PURPOSE AND GOAL</p> <ol style="list-style-type: none"> 1. The CDNST SRMA purpose is to address the requirements of the National Trails System Act as implemented through the 2009 CDNST Comprehensive Plan. 2. The primary goal is to administer the CDNST consistent with the nature and purposes for which this National Scenic Trail was established. 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.
<p>OBJECTIVES</p> <ol style="list-style-type: none"> 1. Provide opportunities to experience available examples of the great diversity of topographic, geologic, vegetation, and scenic phenomenon in proximity to the Continental Divide. 2. Maintain and enhance recreation opportunities for residents and visitors to the area to accommodate hiking, horseback riding, camping, wildlife viewing, and other compatible uses in prescribed settings so visitors are able to realize experiences and benefits. 3. Provide Back Country classification recreation setting opportunities where located on a trail, and Middle Country classification recreation setting opportunities where the CDNST is located on a primitive road. Relocate the CDNST from roads that existed in 1978. 4. Meet the VRM Class objective of I or II in the foreground area (0 through 3 miles) and the VRM objective of I, II, or III in the middle ground area (3 through 5 miles). 5. Maintain, restore, and enhance the SRMA to meet Wyoming Standards for Healthy Rangelands. 6. Promote and demonstrate natural resources Best Management Practices. 7. Develop partnerships and cooperative management programs with adjacent landowners and volunteers.
<p>RECREATION SETTING CHARACTERISTIC DESCRIPTIONS</p> <ol style="list-style-type: none"> 1. The SRMA is managed to protect the CDNST corridor and user experiences as defined for Backcountry or Middle Country areas, while recognizing that the travel route occasionally passes across developed roads, recreation sites, and other more developed areas that existed when the CDNST was designated. 2. The SRMA is described and managed to provide opportunities for trail users to experience and view the diverse topographic, geographic, vegetation, wildlife, and scenic phenomena that characterize the Continental Divide and to conserve natural, historic, and cultural resources. In addition, scenery is managed in adjacent areas to achieve CDNST SRMA VRM objectives.
<p>MANAGEMENT ACTIONS AND ALLOWABLE USE DECISIONS</p> <ol style="list-style-type: none"> 1. Resource management activities are to contribute to meeting Back Country or Middle Country recreation setting objectives. Manage for a Middle Country setting only where the CDNST is located on a Primitive Road. 2. Resource management activities are to meet the VRM Class objectives. The degree of contrast in the foreground and middleground for management actions and developments must be none or weak. The degree of contrast in the background for management actions

- and developments should be none, weak, or moderate.
3. The availability of dependable water sources for recreational purposes will be enhanced.
 4. The use of motorized vehicles by the general public is prohibited; however, motor vehicle use is allowed in accordance with the 2009 CDNST Comprehensive Plan provisions as detailed in Chapter IV(B)(6). Any primitive road within the SRMA is not to be managed or developed into a road. Motor vehicle use is only permitted on designated routes when allowed.
 5. The SRMA is open to oil and gas leasing with an NSO stipulation. Existing oil and gas leases will be intensively managed and monitored.
 6. Best Management Practices are applied to all resource management projects and activities. Wyoming Standards for Healthy Rangelands are to be met.
 7. The SRMA is closed to mineral material disposal.
 8. Mineral withdrawals will be considered for areas with a history of locatable mineral findings. In addition, a withdrawal should be obtained where relocation of the CDNST would not be practical if a mineral development occurred.
 9. Land exchanges and rights-of-way acquisitions are to be pursued with cooperative landowners to improve the continuity of the CDNST corridor and benefit the nature and purposes of the CDNST.
 10. Other resource uses along the CDNST are only allowed where there is a determination that the other use would not substantially interfere with the nature and purposes of the CDNST (16 USC 1246(c)).
 11. The extent of the CDNST SRMA is at least one-half mile on both sides of the CDNST travel route, while additional management direction is prescribed for adjacent areas to assure that the CDNST SRMA VRM objectives are met. *{An adjacent CDNST ERMA should be established to address the VRM objectives.}*

IMPLEMENTATION ACTIONS

1. Establish Trail Class, Managed Uses, Designed Use, and Design Parameters and identify any Prohibited Uses of the CDNST travel route.
2. Provide for development, construction, signing, and maintenance of the CDNST travel route.
3. Establish carrying capacity for the SRMA. The Limits of Acceptable Change or a similar system may be used for this purpose.
4. Identify and preserve any significant natural, historical, and cultural resources within the SRMA.
5. Restore native vegetation and control noxious weeds and invasive species.
6. Relocate the CDNST from roads to trails and primitive roads to the extent practicable. *{Consider relocating a section to the north side of Antelope Hills.}*
7. Identify motor vehicle travel routes and make appropriate travel management decisions.
8. Implement any needed mineral withdrawal within the SRMA.
9. Provide for visitor information, especially where the CDNST coincides with National Historic Trails.
10. Establish monitoring programs to evaluate the site-specific conditions of the CDNST.
11. Accomplish the CDNST Comprehensive Plan monitoring requirements for the RMP area.
12. Encourage volunteers and volunteer organizations to participation in the acquisition, protection, operation, development, and maintenance programs and activities.