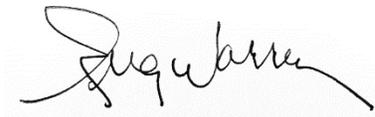


To: Reviewing Officer, USDA Forest Service, Rocky Mountain Region
Attn: Objection Reviewing Officer – Planning Department
740 Simms, Golden, CO 80401
Email to: r02admin_review@fs.fed.us
Subject: SBEADMR FEIS
From: Greg Warren

Name, Address, and Telephone (if available)

Greg Warren, 22 S Juniper Ct, Golden, CO 80401-5002; phone is not available

Signature Verification of Authorship

A handwritten signature in black ink, appearing to read "Greg Warren", is written over a light gray grid background.

Project Name, Responsible Official, and Forest

Project name: Spruce Beetle Epidemic and Aspen Decline Management Response
(SBEADMR)

Responsible Official name and title: Scott Armentrout, Forest Supervisor

Name of affected National Forest: Grand Mesa, Uncompahgre and Gunnison National
Forests

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Introduction

I recognize the need for the Forest Service to expedite a management response to a widespread forest health situation; however, I am concerned with the approach of the SBEADMR analysis and that the forest did not address new information and other important changed conditions on the forest. The FEIS seems appropriate for a Forest-wide area analysis and/or Forest Plan amendment, but not for project-level site-specific NEPA.

The lack of site-specific information proves difficult for the public to understand and analyze aspects of the SBEADMR project. The lack of site-specific information also proves problematic for disclosing and analyzing SBEADMR's cumulative impact on the environment, which results from the incremental impact of SBEADMR when added to other past, present, and reasonably foreseeable future actions.

Alternative 2 substantially affects the Continental Divide National Scenic Trail (CDNST) setting; however, these effects are not disclosed. CEQ regulations requires that impacts of a proposed project must be disclosed. This includes direct, indirect, and cumulative impacts (or effects) the proposed agency may have, as well as connected, cumulative, and similar actions.

Reasons for, and Suggested Remedies to Resolve, your Objections

Objection: Failure to implement the National Trails System Act

Discussion

Plan components for the CDNST corridor need to provide for Recreation Opportunity Spectrum (ROS) Primitive or Semi-Primitive Non-Motorized experiences to extent practicable. In addition, the CDNST travelway is a concern level 1 travel route and scenic management objectives of high or very high must be met in the immediate foreground and foreground to the extent practicable. In some areas, the CDNST corridor may need to be restored to achieve desired recreation setting and visual quality conditions.

ROS classes are summarized the Comprehensive Plan to assure that identical definitions are used across administrative units; this summary is not to be interpreted as indicating a desirability or compatibility of managing the CDNST corridor to provide for Semi-Primitive Motorized, Roaded Natural, and Rural ROS class conditions. Primitive and Semi-Primitive Non-Motorized classes are consistent with the nature and purposes values of the CDNST. Management direction for Semi-Primitive Motorized, Roaded Natural, Rural, and Urban ROS classes provide for uses that substantially interfere with the nature and purposes of the CDNST.

The SBEADMR FEIS and draft decision fails to provide for the nature and purposes of the CDNST. In 2009, the amended CDNST Comprehensive Plan and FSM 2353.4 constituted new information (40 CFR 1502.9(c)). The responsible official must review the new information and determine its significance to environmental concerns and bearing on the 1983 Land Management Plan (LMP) direction (FSH 1909.15 - 18). In regards to environmental documents for enacted LMPs, determine if Management Area (MA) prescriptions and plan components along the CDNST travel route and corridor provide for the nature and purposes of the CDNST (FSM 2353.42 and FSM 2353.44b(1)). If not, the Plan needs to be amended or revised following the appropriate NEPA process to address the planning requirements of the National Trails System Act (16 U.S.C. 1244(5)(f) as implemented through the 2009 CDNST Comprehensive Plan and FSM 2353.44(b). Furthermore, project proposals, such as SBEADMR, will bring the CDNST into the scope of a NEPA process 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(c)). This in turn would trigger the need for a land and resource management plan amendment and the development of a CDNST unit plan. Land management plans and projects are to protect the settings of potential CDNST rights-of-way and high potential route segments where the rights-of-way is yet to be selected and the travelway officially located (1246(a)(2) and 16 U.S.C. 1244(f)(3)). The Forest Service must

not undertake any major Federal action which (1) may adversely impact potential CDNST rights-of-way and corridor locations, (2) limit the choice of reasonable alternatives, and (3) prejudice ultimate rights-of-way and locations decisions (40 CFR 1506.1).

SBEADMR EIS Observations

Alternative 2 strives to provide adequate “design criteria” to protect the visual quality along high potential CDNST travel routes through mitigating the effects timber harvest and road development activities. However, development criteria do not address the negative effects of road construction and other management actions on the ROS setting along the CDNST corridor. These effects are not disclosed in the EIS, but would result in a substantial interference to providing the nature and purposes of the CDNST. This degradation is not in compliance with the National Trails System Act.

The draft decision states, “My decision takes into consideration the balance between action and associated resource impacts. Among other impacts analyzed in the FEIS, my decision will authorize commercial timber harvest along and in the vicinity of the Continental Divide National Scenic Trail (CDNST). Approximately 15 miles of the existing trail are co-located or within one half mile of proposed resiliency, salvage harvest, and hazard tree treatments. Most of this area is of moderate scenic integrity, as it has been heavily managed and much is located along an existing road. I have included a design feature in my decision to specifically minimize potential impacts to the scenic integrity of the Trail.” Draft ROD, Page 13

The FEIS and draft Decision addresses scenery along the CDNST travelway, but fails to address restoration of the CDNST corridor to provide for desired ROS settings.

See [Appendix A](#) for discussion of the Scenery Management System (SMS) and Recreation Opportunity Spectrum (ROS) relationship.

Remedy

Revise the 1983 Forest Plan (as amended) in compliance with the CDNST Comprehensive Plan, FSH 1909.12 24.43, FSM 2353.42, FSM 2353.44, and E.O. 13195 direction. In the interim, address forest health issues as allowed through 36 CFR 220.6 part e, while recognizing that the effects of road reconstruction and construction within the CDNST corridor (depicted on the following map), may substantially interfere with the nature and purposes of the CDNST.

Objection: Failure to disclose adaptive management site-specific effects

SBEADMR EIS Observations

Design features presented in Appendix B represent programmatic direction since the location of application is yet to be identified. To be compliant with NEPA, site-specific planning processes would need to be completed in the future. However, it is apparent that the Forest Supervisor is proposing to implement site-specific actions without following required NEPA processes to address site-specific impacts.

“When using adaptive management, display the proposed action as an initial management action and a collection of possible adjustments or acceptable tools to be used to modify the initial action to achieve the intended effects. Disclose the site-specific effects of all of these actions, adjustments, or use of acceptable tools in the analysis along with the monitoring methods to be used to determine the effectiveness of each. If monitoring demonstrates that the intended effects are not being achieved through the initial management action, the action can be modified using one or more of the identified adaptive management actions in a way that better achieves the intended effects.” FSH 1909.15 14.1.

The SBEARMR project does not disclose the site-specific effects of all of these actions, adjustments, or use of acceptable tools in the analysis along with the monitoring methods to be used to determine the effectiveness of each. Much of the site-specific assessments are slated to occur during implementation:

“Design features will be applied to treatments to minimize or avoid undesirable impacts on resources including, but not limited to, vegetation, soils, water, wildlife, recreation and cultural resources. The appropriate design features would be applied when surveys or management activities indicate a need to do so. Implementation and monitoring of the appropriate design features is required.” *FEIS, Appendix B – Draft Decision, Page 7*

“During planning of a particular treatment authorized under the EIS, an interdisciplinary team (IDT) would be used to complete required surveys in accordance with Forest Plan and Region 2 policy requirements. The IDT would also complete treatment layout, including treatment units, location of roads, skid trails and landings, and identifying water influence zones. The team would also identify applicable treatment design features that would be applied to the treatment area. The Pre-Treatment Checklist, Appendix C, would be used to document completed work. Forest Service staff specialists would sign off on completed work before it would be approved by the District Ranger.” Appendix B

Remedy

Require that site-specific NEPA processes be completed prior to implementing actions, especially road reconstruction and construction activities, as required by FSH 1909.15 14.1.

Objection: Substantial changes between the DEIS and FEIS

SBEADMR EIS Observations

The Forest Service violated NEPA by failing to conduct a supplemental DEIS to address site-specific road construction effects. “The draft statement must fulfill and satisfy to the fullest extent possible the requirements established for final statements in section 102(2)(C) of the Act. If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

I feel that the Forest Service erred by failing to conduct a supplemental DEIS after describing site-specific locations of approximately 188 miles of new roads. These road locations were not analyzed in the Draft EIS nor were the effects of the specific road locations disclosed. I believe this is a substantial change to the Draft EIS, is relevant to environmental concerns, and is qualitatively different from the programmatic impacts studied in the Draft EIS. A supplemental DEIS is required if: "(i) the agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts."

Policy states that, “When using adaptive management, display the proposed action as an initial management action and a collection of possible adjustments or acceptable tools to be used to modify the initial action to achieve the intended effects. Disclose the site-specific effects of all of these actions, adjustments, or use of acceptable tools in the analysis along with the monitoring methods to be used to determine the effectiveness of each...” FSH 1909.15 14.1. Site-specific effects of all of the proposed actions were not disclosed in the SBEADMR DEIS and FEIS.

Remedy

Prepare a Supplemental DEIS with site-specific road information requesting public comment or accept that the SBEADMR project NEPA compliance is only consistent with programmatic planning NEPA processes.

Objection: Inadequate response to public comments

Concern: [Seq#284] – Continental Divide National Scenic Trail

FS Response (H-1, page 210): The history of the current trail location is relevant to ongoing and future management surrounding the trail, including the SBEADMR proposed action. The CDNST is on motorized routes and is located in a number of areas that have been actively managed for timber in the past and under the current Forest Plan. The 1993 EIS recognized that the trail location was in an area of active timber management and clearly stated that timber management would continue in these areas.

Observation: The response introduces the 1993 EIS for the first time without describing the nature of this NEPA document. I assume that the EIS being referenced is, “The Final Environmental Impact Statement for the Continental Divide National Scenic Trail in Colorado and Wyoming.”

The preparation of a Supplemental Information Report (FSH 1909.15 18.1) would find that that many parts of the 1993 EIS decisions are inconsistent with new information that is found in the 2009 CDNST Comprehensive Plan, FSH 1909.12 24.43, FSM 2353.42, FSM 2353.44, and E.O. 13195. A principle concern is that the 1993 decision did not recognize the nature and purposes of the CDNST. As such, the 1993 EIS failed to determine if timber harvest actions would substantial interfere with CDNST values.

The 1993 EIS states, “The designation of the CDNST will have little or no effect on timber management within the proposed corridor. It is not the intent to develop a separate "management plan" for the CDNST, but to provide development and management of the Trail in accordance with the individual Forest Plans and Forest Service Regional direction. This management practice is to be integrated into the overall prescription for the land area through which the Trail passes.” Contrary to this description, it is the intent of Congress for the CDNST to have a Comprehensive Plan (National Trails System Act, Section 5(f)). Though, the Forest Service has opted to attempt to implement this National Trails System Act direction through staged decisionmaking as described below.

Comprehensive plan requirements (16 U.S.C. 1244(f)) for the CDNST are addressed through staged decision processes: (1) the 2009 Comprehensive Plan established desired conditions and broad policy and procedures, (2) forest plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System, provide integrated resource management direction for special areas, and address programmatic planning requirements as described in the Comprehensive Plan (Chapter IV), and (3) site-specific plans complete the comprehensive planning process through field-level actions to protect the corridor and then maintain or construct the travel route (FSM 2353.44b part 2).

I agree, the history of the current trail location is relevant to ongoing and future management surrounding the trail, including the SBEADMR proposed action. The route selected in the 1993 EIS was greatly influenced by the 1985 CDNST Comprehensive Plan, which was amended in 2009 to correct deficiencies in the direction. These changes are addressed in Federal Register - Notice of Final Amendments to Comprehensive Plan and Final Directives - Approved by Associate Chief Hank Kashdan, Vol. 74, No. 191, Monday, October 5, 2009.

In addition, the choice of the Colorado route was also influenced by a National Trails System Act required action that is yet to be completed of selecting the rights-of-way. National Trails System Act, Section 7(a)(2), describes, "That in selecting the rights-of-way full consideration shall be given to minimizing the adverse effects upon the adjacent landowner or user and his operation. Development and management of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple-use plans for the specific area in order to insure continued maximum benefits from the land." This direction related to the plans that existed in 1978 when the CDNST was designated by Congress. Nevertheless, a National Scenic Trail optimum location assessment may find that designing the CDNST rights-of-way corridor to pass through inventoried Primitive and Semi-Primitive Recreation Opportunity Spectrum (ROS) settings would insure continued maximum benefits of the land. This would include the recreation and conservation benefits resulting from: (1) locating the National Trail corridor "to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas..." (16 U.S.C. 1242(a)(2)); (2) avoiding, to the extent possible, activities along the NST that would be incompatible with the purposes of the CDNST for which it was established (16 U.S.C. 1246(c)); and (3) contributing to achieving outdoor recreation, watershed, and wildlife and fish multiple-use benefits (16 U.S.C. 528). The rights-of-way requirement of 16 U.S.C. 1246(a)(2) is directed at selecting the 5-state CDNST rights-of-way corridor and does not diminish or modify the nature and purposes values of the CDNST (16 U.S.C. 1246(c)).

FS Response (H-1, page 210): Regarding the impact to the nature and purposes of the CDNST by vegetation management activities, the project is not expected to impact hiking or horseback riding along the trail. A design feature, not to skid or haul on the trail and to minimize crossings of the trail, is identified to protect the trail from management activities. The purpose of the trail for these transportation modes is not affected.

Observation: I support the EIS describe design features that reduces the effect on hiking and horseback riding activities. Design features do not address mitigating the displacement of hikers and equestrians during activity timber harvest activities. The existing and proposed management direction does not address providing for primitive or semi-primitive non-

motorize ROS class settings to the extent practicable recognizing and that restoration of existing settings may be needed in some locations.

FS Response (H-1, page 210): The project will change the existing scenery, but would not affect the nature and purposes of the CDNST.

Observation: The project does not provide for establishing desired CDNST ROS class settings, which would likely lead to a substantial interference to the nature and purposes of the CDNST.

FS Response (H-1, page 210): The removal of dead trees is generally regarded as an improvement, even if a large open space is created. The removal of dead trees is a response to an epidemic and will create a better scene in the long run, compared to jack-strawed deadfall along the trail.

Observation: This response is not supported by DEIS and FEIS analyses.

FS Response (H-1, page 210): Resiliency treatments will create visual variety, as they are designed to introduce age class diversity to single-aged stands. Using our standards and guidelines, considering the CDNST as a sensitivity level 1 viewing point, and using retention as the VQO for the corridor, treatments in sight of the CDNST will be designed to fit into the landscape and should not be highly noticeable or objectionable to most people. There will be the appearance of disturbance during implementation and for a period afterwards. In the long-term, the forest should be more scenic for the visitor... In keeping with the nature and purposes of the CDNST, management of the landscape to enhance the scenery while providing the recreational experiences that are the intent of the CDNST are possible.

Observation: The SBEADMR project does not result in establishing desirable CDNST ROS settings, which should have been a considerations in the development of the EIS.

FS Response (H-1, page 211): It is important to note that none of the areas along the existing trail or the potential re-routes are considered primitive. There may be areas of land that are far enough from motorized routes that could be considered for classification as semi-primitive non-motorized, however they do not appear to meet the size requirements to be classified as such. The treatments proposed in the area of LuJan to LaGarita and in the Windy Peak area are generally in areas that are already roaded. Some temporary road

construction followed by removal is proposed in the FEIS. Following removal, the areas would have similar character as prior to treatment.

Observation: This response indicates that the 1983 Forest Plan fails to provide for the nature and purposes of the CDNST. The 1983 Forest Plan needs to be amended or revised to address the CDNST direction in the 2009 CDNST Comprehensive Plan, FSH 1909.12 24.43, FSM 2353.42, FSM 2353.44, and E.O. 13195. It seems that much of the CDNST corridor needs restoration work to provide for more primitive ROS settings.

FS Response (H-1, page 211): The last part of the comment confuses the findings requirements of a CE with those of an EIS; an EIS should disclose impacts, including those that are significant. An EIS does not document that there are no extraordinary circumstances; it is the very existence of extraordinary circumstances that triggers evaluation of those circumstances with additional NEPA – either an EA or EIS.

Observation: This comment was based on the programmatic nature of the DEIS. When commenting, I assumed that site-specific NEPA compliance would occur at a later date through staged decisionmaking. The SBEADMR FEIS continues to be programmatic in nature with limited site-specific analyses.

Any implementation strategy involving “Timber Stand Improvement” guidance in 36 CFR 222.6 needs to recognize that the CDNST corridor is a congressionally designated area that would be negatively affected by road construction or reconstruction.

Concern: [Seq#287]

FS Response (H-1, page 214): While the GMUG Forest Plan is due for Revision, forest management activities that are consistent with the existing Plan as well as contemporary law and policy are legal and appropriate. The GMUG LRMP does include guidance for what is now the CDNST viewing corridor. Combined with existing law and policy for the CDNST, these provide the Forest Service with sufficient direction to coordinate management activities that may affect the CDNST in such a way as to not compromise the nature and purpose of the Trail. The Comprehensive Plan for the CDNST provides further specific detail regarding the recreation and scenery objectives that should be safeguarded in the context of Forest management. The analysis in the Final EIS addresses in further detail the extent of overlap of the CDNST with the proposed activity, thereby associating the pertinent design features to that particular piece of ground. These design features are identified in order to mitigate potential impacts to scenery and recreation from the proposed activity. Finally, the final EIS discloses with greater detail the potential direct, indirect, and cumulative impacts from the

proposed activity--including the pertinent design features/mitigation measures --- on the CDNST.

Observation: The 1983 Forest Plan and SBEADMR EIS inconsistent with “contemporary law and policy.” The Forest Plan and SBEADMR EIS fail to address the requirements of 2009 CDNST Comprehensive Plan, FSH 1909.12 24.43, FSM 2353.42, FSM 2353.44, and E.O. 13195. Of primary concern is that the existing Forest Plan, as amended, direction fails to establish ROS class settings that provide for the nature and purposes of the CDNST.

Remedy

The FS response to the above substantive comments did not follow the guidance in 40 CFR 1503.4(a) parts 1 through 4. The corrective action is to prepare a Supplemental DEIS that appropriately addresses substantive comments as required by CEQ regulations.

Description of the connection between your objections and your prior comments

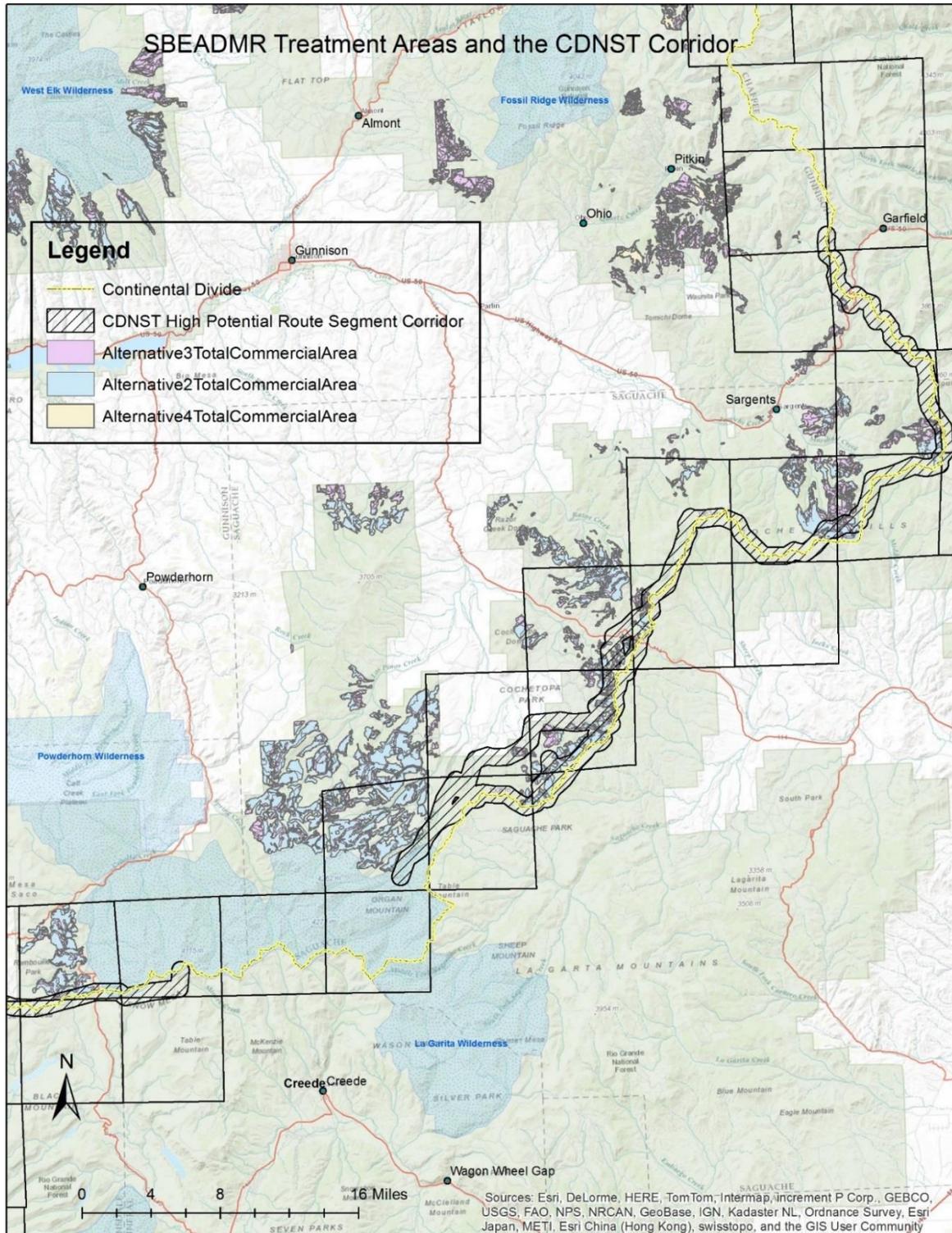
I addressed concerns associated with these objection points in scoping comments and comments on the DEIS, as summarized below:

- Scoping Comments: A couple of questions regarding the SBEADMR Project: (1) I didn't see a paper(s) addressing Basic Science and Analysis Assumptions: Recreation and Congressionally Designated Areas (e.g., Continental Divide Trail). Does such a paper(s) exist for this programmatic analysis? (2) Is the basic NEPA implementation strategy to follow “Timber Stand Improvement” guidance in (36 CFR 222.6(2)(6)) or will additional EAs/EISs be prepared to address site specific concerns? *June 16, 2014*
- Scoping Comments: An overriding concern is the dated nature of the Forest Plan with revision to have occurred in 1997. Possibly, the SBEADMR action should be address as part of revision and not as a standalone analysis. *June 17, 2014*
- Scoping Comments: Any implementation strategy involving “Timber Stand Improvement” guidance in (36 CFR 222.6(2)(6)) or other CE strategy should protect established ROS settings of primitive, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized settings with no roading allowed without a Forest Plan amendment. In addition, high potential route segments of the congressionally designated Continental Divide National Scenic Trail should protect the CDNST corridor to provide for either Primitive or Semi-Primitive Non-Motorized settings along the CDNST travel route to the extent practicable. (The CFR cited in previous emails (36 CFR 222.6(2)(6)) is incorrect

and/or has been replaced. The current road building CFR direction of concern is cited in 36 CFR 220.6 part e.) *June 17, 2014*

- Scoping Comments: I'm looking through the SBEADMR DEIS trying to ascertain the potential impacts on the Continental Divide National Scenic Trail. I found the three CDNST text references; however, I feel that I could better understand the effects of the alternatives if I could view specific GIS data. For the purpose of providing meaningful DEIS comments, I would appreciate receiving an ArcMap 10 geodatabase (or shapefiles) of the commercial and total opportunity areas, and road construction locations, by alternative. *June 21, 2015* / **FS Response:** There are no firm new road construction locations in the DEIS so there is no GIS layer. *July 22, 2015*
- Summary of DEIS comments: Action alternatives need to be modified to recognize the Continental Divide National Scenic Trail (CDNST) corridor as a Congressionally Designated Area... I believe that the management of the CDNST corridor needs to be addressed through the CDNST Comprehensive Plan, FSM 2353, and FSH 1909.12 24.43 policy direction... The EIS needs to disclose that constructing and reconstructing roads (and potentially other vegetation management actions) within the CDNST corridor would have a potential substantial negative effect on providing for the nature and purposes of the CDNST... The SBEADMR project reliance on the 1991 Forest Plan guidance is legally flawed, since the SBEADMR proposed action and alternatives provide management direction that are derived outside of the revision and amendment processes that are found in the Planning Directives. Prior to addressing forest resiliency and recovery concerns, the Forest Plan needs to be revised providing for integrated resource management for all resources as guided by direction in the CDNST Comprehensive Plan, Planning Rule, and Planning and Recreation Directives. *July 30, 2015.*

Map of CDNST Corridor



Appendix A - Background - SMS and ROS Relationship

The relationship between the Scenery Management System and the Recreation Opportunity Spectrum systems are discussed in the Landscape Aesthetics Handbook. Landscape Aesthetics - A Handbook for Scenery Management (Agricultural Handbook Number 701); Appendix F - 1 - Recreation Opportunity Spectrum:

“Recreation planners, landscape architects, and other Forest Service resource managers are interested in providing high quality recreation settings, experiences, and benefits for their constituents. This is accomplished, in part, by linking the Scenery Management System and the Recreation Opportunity Spectrum (ROS) System. In addition, providing a single constituent inventory and analysis for both systems is helpful in coordinating management practices.

Esthetic value is an important consideration in the management of recreation settings. This is especially so in National Forest settings where most people expect a natural appearing landscape with limited evidence of "unnatural" disturbance of landscape features...

Although the ROS User's Guide mentions the need for establishing a value for different landscapes and recreation opportunities within a single ROS class in the attractiveness overlay, there is currently no systematic approach to do so. For instance, in most ROS inventories, all lands that are classified semi-primitive non-motorized are valued equally. Some semi-primitive non-motorized lands are more valuable than others because of existing scenic integrity or scenic attractiveness. The Scenery Management System provides indicators of importance for these in all ROS settings. Attractiveness for outdoor recreation also varies by the variety and type of activities, experience, and benefits possible in each setting...

In the past, there have been apparent conflicts between The Visual Management System sensitivity levels and ROS primitive or semi-primitive classes. One apparent conflict has been where an undeveloped area, having little existing recreation use and seldom seen from sensitive travel routes, was inventoried using The Visual Management System. The inventory led to a "sensitivity level 3" classification, and thus apparently contradicted ROS inventory classes of primitive or semi-primitive non-motorized or semi-primitive motorized. Using criteria in The Visual Management System, in a variety class B landscape with a sensitivity level 3, the initial visual quality objective is "modification" or "maximum modification," depending on surrounding land classification. However, because of factors such as few social encounters, lack of managerial regimentation and control, and feelings of remoteness, the same area having little existing recreation use may establish an ROS primitive, semi-primitive nonmotorized, or semi-primitive motorized inventory classification. There have been concerns over the premise of The Visual Management System that the visual impact of management activities become more important as the number of viewers increases; yet The

ROS System emphasizes solitude, infrequent social encounters, and naturalness at the primitive end of the spectrum, with frequent social encounters and more evident management activities at the urban end. Value or importance are dependent on more than the number of viewers or users, and the key is that both the Scenery Management System and ROS are first used as inventory tools. Land management objectives are established during, not before, development of alternatives. Where there does appear to be a conflict in setting objectives for alternative forest plans, the most restrictive criteria should apply. An example might be an undeveloped land area in a viewshed managed for both middleground partial retention and semi-primitive non-motorized opportunities. Semi-primitive non-motorized criteria are usually the more restrictive.

The Scenery Management System and ROS serve related, but different, purposes that affect management of landscape settings. In some cases, ROS provides stronger protection for landscape settings than does the Scenery Management System. This is similar to landscape setting protection provided by management of other resources, such as cultural resource management, wildlife management, and old-growth management. In all these examples, there may be management directions for other resources that actually provide higher scenic integrity standards than those reached by the Scenery Management System. Different resource values and systems (the Scenery Management System, the ROS System, cultural resource management, wildlife management, and old growth management) are developed for differing needs, but they are all systems that work harmoniously if properly utilized. In all these examples, there are management decisions made for other resources that result in protection and enhancement of landscape settings.”