

Letter From John Daggett, retired Civil Engineer, US Army Corps of Engineers

While I am retired now, my experience as a Civil Engineer and Federal Manager working under NEPA for over 38 years would give me concern on this project because of the Forest Services' plan to just use a "Categorical Exclusion" process. If you review their own NEPA guidelines for a Categorical Exclusion, I don't see how construction of eight miles of new trail in steep mountain terrain to their own Construction Standards would fit a Categorical Exclusion. Even the reconstruction of existing trail may not fit depending on what their plans are. Right now, all there is are some lines drawn on a map.

From the Forest Service's own "Trail Construction and Maintenance Notebook," good planning is essential in avoiding unplanned problems and costs. One of the quotes in their Notebook states, "Planning is stupidity avoidance". Right now, we have been told the new trail will be nonmotorized but what does that really mean? What Trail Class is it? Is it just a foot path or will it also be usable for stock or mountain bikes?

Having grown up in Harlowtown, I have spent a lot of time in the northern part of the Crazies. I have used the Sunlight Lake Trail, a few drainages to the east of these trails, and it is very rough in spots. When I was last on it, you had to scoot on your butt on part of it or risk your life. I would not consider taking my stock on the upper portion of it because it would be too much risk.

My point is that the Forest Service needs to spend an adequate amount of time planning this project and address all the issues with their proposal. These include fish, wildlife, construction and the basic decision to give up its right to use trails they and the public have used the last 100 years and build new trails at taxpayers expense. Their trail budget has been totally inadequate for many years with more cuts proposed, so how is it that there will be money to construct the new trail? The public should expect to be able to safely use this new trail and not fall of a cliff or get bogged out in parts of it if it is built. Right now we have no idea because there has been no preliminary ground work and we are just going off of lines on a map. A Categorical Exclusion is intended for work like general trail maintenance of existing trails, not abandoning several miles of existing trails and constructing new trail in steeper terrain. They should do an Environmental Assessment for this project to give it the proper planning it deserves.

Anyone interested can look up on the internet details of the Forest Service's NEPA process, Trail Construction and Maintenance Notebook, and USDA Forest Service Trail Plans and Specifications.

John Daggett
Glasgow, MT