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March 20, 2018

Forest Supervisor Scott Armentrout
Attn. Planning Team
Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG)
2250 South Main Street
Delta, CO 81416

RE: CDTC Comments on GMUG National Revised Scenery, Recreation and Designated Area Assessments

Dear Forest Plan Revision Team,

Thank you for the opportunity to comment on the Revised GMUG National Forest Assessments dated March 2018. We submitted comments on these Assessments in December 2017. We are happy to assist you with the Plan revision process and help you strive for the highest quality outcome possible.

The Continental Divide Trail Coalition (CDTC) is the 501(c)(3) national nonprofit organization formed to work with the federal land management agencies to protect, complete, and promote the Continental Divide National Scenic Trail (CDNST). The CDTC has more than 2,000 members nationwide. To date, CDTC has been successful in coordinating volunteer stewardship to improve and complete the CDNST, building positive relationships with the federal land managers and local trail focused groups, organizing special events to help educate the public about the CDT, implementing an Adopt-A-Trail and Gateway Community Program, and encouraging Congress to continue to appropriate funding for the CDNST in the Forest Service budget.

In May 2014, CDTC signed a Memorandum of Understanding to establish our role as a national organization working in partnership with the U.S. Forest Service on behalf of the Continental Divide National Scenic Trail.

BACKGROUND

We recommend that the following language from the Forest Service’s Leadership Vision for the CDT and the CDNST Study Report be added to the “Historical Context” portion of the forthcoming Revised Planning document, so that readers have the opportunity to understand the significance of the Continental Divide National Scenic Trail within the National Forest:

Congress designated the Continental Divide National Scenic Trail (CDNST) in 1978 as a unit of the National Trails System. The CDNST traverses the Continental Divide for more than 3,100 miles between Mexico and Canada. It travels through 25 National Forests, 21 Wilderness areas, 3 National Parks, 1 National Monument, 8 BLM resource areas and through the states of Montana, Idaho, Wyoming, Colorado and New Mexico. The vision for the CDNST is a primitive and challenging backcountry trail for the hiker and horseman on or near the Continental Divide to provide people with the opportunity to experience the unique and incredibly scenic qualities of the area.¹

National Scenic Trails, like the CDNST, are created to conserve the nationally significant scenic, historic, natural and cultural qualities of the area. In addition, these trails are designed for recreation and the enjoyment of these very special places.

The CDNST Experience is defined in the Continental Divide National Scenic Trail Study Report as an “intimate one, where one can walk or ride horseback across vast fields of wildflowers and contemplate a story dating from the dawn of earth’s history...along the way the tranquility of the alpine meadows, verdant forests and semi-desert landscape overwhelms anyone who passes that way. The Trail would provide the traveler his best encounter with the Continental Divide—its serenity and pure air—and would supply for every trail traveler some of the world’s most sublime scenes.”²

REFERENCE TO THE 2009 CDNST COMPREHENSIVE PLAN

The *Continental Divide National Scenic Trail Comprehensive Plan* was approved by the U.S. Forest Service and set forth as policy in 2009. This over-arching policy direction serves to implement Congress’s direction in the National Trails System Act, and should be incorporated into Forest Plan direction and project proposal evaluation. The *Comprehensive Plan* also incorporates FSM 2353.42 and 2353.44b.

Upon review of the revised Scenery, Recreation and Designated Areas Assessments, we offer the following comments:

We are encouraged by the revised Draft Assessments acknowledgement of the CDNST; however details are still lacking with regard to the Trail’s existing management direction, conditions and need for change. For example, the revised Recreation Assessment does not disclose what the existing ROS classification is for the Trail. The Assessment should set forth direction that the CDNST be classified as “primitive and semi-primitive” as well as having “High Scenic Value.”

¹ CDT Leadership Council Vision and Guiding Principles

² CDNST Study Report Page 18

The revised Assessments imply that CDNST scenic and recreational use inventories are forthcoming and will be incorporated in the upcoming Revised Draft Forest Plan. We may be able to offer CDNST volunteers to complete these inventories.

The Assessments note that some portions of the CDNST is currently open to bicycle and motorized uses. It would be useful to our members to identify in a narrative and maps where these uses are occurring, the condition of the Trail in those areas, and goals/direction/objectives as well as criteria for relocating the Trail.

We appreciate the inclusion of some of our December 2017 recommendations in the revised Assessments and urge the Planning Team to further consider incorporating our language below in the forthcoming Revised Draft Forest Plan:

1. There is a need to review new uses allowed along the CDNST route in order to prevent substantial interference to the nature and purpose for which the Trail was created. This would include the establishment of monitoring programs to establish carrying capacity and resource issues prior to allowing any new uses.
2. There is a need to review the inclusion and support of volunteer stewards and youth corps partners in the management, maintenance, and relocation of the CDNST where segments are currently experiencing bicycle and motorized uses.
3. There is a need to ensure identification, provision, development, and access to water resources for users along the CDNST in the GMUG Forest.
4. There is a need to update the Recreation Opportunity Spectrum classifications and adjust the total acres in each class specifically for the CDNST across the forest.
5. There is a need to provide forest direction on the management of snowmobiles/over-snow vehicles
6. There is a need to address the CDNST as a Corridor and special designation area in the upcoming Revised Draft Forest Plan and reflect the corridor on maps and Forest information resources.
7. There is a need to address permitting for large and/or recurring special /recreational events, including competitive events and shuttle services along the CDNST Corridor. This should include evaluation of the carrying capacity of the Trail Corridor to sustain such uses and their impacts to the nature and purposes for which the CDNST was created.
8. There is a need to update and address existing and proposed energy and utility developments, as well as extraction activities along the CDNST Corridor in the GMUG National Forest.
9. There is a need to include management direction for the CDNST as specified by the 2017 Forest Plan Component Document approved by the USFS which guides management across all US Forest Service Units.
10. There is a need to relocate the CDNST off of roads and ensure the intent of the 2009 Comprehensive Plan direction is met. CDTC encourages the use of the newly adopted CDNST Optimal Location Review Process (attached) and include the following:

- a. It is the intention of Congress for the Continental Divide National Scenic Trail to be a primitive and challenging non-motorized trail traversing the Continental Divide from Canada to Mexico.
- b. New CDNST construction should link to existing non-motorized segments of trail, or a plan should be in place to address the motorized uses on either end in the near future in order to meet the intent of the CDNST as a non-motorized trail.
- c. All agencies should plan and construct the CDNST to include the following characteristics:
 - Built to a non-motorized standard – Fully accessible for foot and equestrian use. Portions accessible for mountain bikes where appropriate and consistent with Unit Plan direction
 - Challenging – Requiring a need for self-reliance and backcountry skills.
 - Located through the most primitive, diverse and undeveloped landscapes on or near the Continental Divide.
 - Accesses or is routed near nationally significant scenic, historic, cultural and natural features.
 - Allows for an opportunity to view dramatic or unique scenery.
 - Allows for an opportunity to view wildlife.
 - Provides appropriate access to water sources.
 - Developed to the most simple, yet high quality standard.

11. There is a need for designation of the Trail as a Special Management Area and be specifically addressed in a CDNST GMUG Unit Plan.

Thank you for the opportunity to comment and participate in the ongoing process to revise the GMUG Forest Plan. We look forward to working with the entire Forest staff and ensuring the CDNST remains a high quality scenic, recreational resource across the GMUG Forest.

Sincerely,

Teresa Ana Martinez /s/

Teresa Ana Martinez
CDTC Director

cc: Brenda Yankoviak, CDNST Program Administrator; Jim Wolf, Director Continental Divide Trail Society