



May 30, 2018

Grand Mesa, Uncompahgre, & Gunnison National Forests  
Attn: Forest Plan Revision Team  
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Hello GMUG National Forests,

The Colorado Trail Foundation is pleased to comment on your March 2018 Forest Plan Revision: Scoping. We applaud your effort in revising your Forest Plan. This revision is a very necessary and important component in your managing the great GMUG National Forests! Our comments on the Scoping follow.

#### INTRODUCTION

The Colorado Trail Foundation (CTF), in partnership with the U.S. Forest Service (FS), builds and maintains the 567-mile Colorado Trail (CT) from Denver to Durango. Our FS relationships encompass 5 Forests and 11 Ranger Districts all within Colorado and Rocky Mountain Region 2 of the FS. Ninety-nine percent of the CT is FS land managed under a longstanding Challenge Cost Share Agreement. The CT is a very popular and unique long-distance, high altitude trail widely considered a Colorado treasure. The CT is maintained primarily by a dedicated group of CTF volunteers: 800 workers devoting 20,000 hours in 2017. Three full time employees are headquartered in our Golden, Colorado office along with our George Miller Field Operations Center in Poncha Springs, Colorado.

The CT is co-located with the Continental Divide National Scenic Trail (CDNST) for 314 miles with the CTF having the “primary responsibility for the development, maintenance, continued improvement, and upkeep” (re our Challenge Cost Share Agreement) for this expanse. More particularly, the CT/CDNST meanders 188 miles in GMUG Forests along the Continental Divide along with two other Forests, the Rio Grande NF and Pike San Isabel NF with one end point being Lake Ann Pass in the north and the other being Cuba Peak in the west.

#### COMMENTS

The Scoping document requests comment on its three Parts: I. Key Needs for Change, II. Vision and Distinctive Roles and Contributions, III. Management Area Framework. We are highly supportive of these foundations for the Plan! These form an excellent basis for an analysis of the current situation, a long-range vision for the Forest and methods to manage it in a dynamic environment.

Relative to Part III Management Area Framework, we are also supportive of the notion of an adaptive framework versus a prescriptive framework in context with an ever-changing environment. This particularly considers the extraordinary growth in population and concurrent expansion of usage of our great public lands. An adaptive framework allows the Forest Supervisor the latitude to make judgments more based on ‘then’ future conditions rather than being unduly limited by historic rules. In this context, we are also aware that a prescribed Management Area might be an exception to this approach.

Given the above, we strongly encourage the GMUG NF's to consider a Management Area designation for the CDNST. As background, the CDNST is defined within Federal statute and its accompanying Rule Set (see below Citations). These Rules were carefully crafted over the past 50 years since the passage of the 1968 National Trails System Act as amended in anticipation of their utilization in actual "on the ground" situations such as a Forest Plan. In particular, see FSM 2353.44.b-CDNST, 1.a. which states in part "...establish a management area for the CDNST that is broad enough to protect natural, scenic, historic, and cultural features (FSH 1909.12)." This notion is buttressed by the CDNST 2009 Comprehensive Plan and various Forest Service interpretive memos (see below CDNST Rule Set). A Management Area designation clearly specifies these defined protections and obligations to be implemented by the various public agencies such as the Forest Service and volunteer organizations such as The Colorado Trail Foundation. We view this as solid direction to guide our future work.

Alternatively, we understand that a trail corridor approach might be utilized for the CDNST with results similar to that of a Management Area. A trail corridor is a term of art variously defined that could address the protections and obligations of the CDNST. And it could offer the Forest Supervisor greater future latitude in modifications to the trail in situations such as a re-route without the need to modify the Forest Plan with a concurrent environmental analysis. In sum, this too could be a responsible approach for the GMUG Forest Plan if carefully implemented.

Finally, we are aware of your collaboration with the Rio Grande NF and the Pike San Isabel NF on these types of matters. The Rio Grande NF in particular is in the latter stages of its Forest Plan initiative. The CDNST meanders across these 3 Forests along the Continental Divide so it is imperative that there be coordination amongst all three jurisdictions.

The CTF most appreciates the opportunity to comment on this critical endeavor by the GMUG National Forests and welcomes back your comments and questions.

Best wishes for a successful revision to your Forest Plan!



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Citations:

- March, 2018 Grand Mesa, Uncompahgre, and Gunnison National Forests “Forest Plan Revision: Scoping”
- 2012 Forest Planning Rule
- FSH 1909.12 Land Management Plan
- 2018 Challenge Cost Share Agreement Between the US Forest Service and The Colorado Trail Foundation
- CDNST Rule Set:
  - 1968 National Trails System Act as amended
  - 2009 CDNST Comprehensive Plan
  - FSM 2353.4 Administration of National Scenic and National Historic Trails
  - September, 2016 Rocky Mountain Region letter-“Developing Forest Plan Direction for the Continental Divide National Scenic Trail”
  - April, 2018 Rocky Mountain Region memo-“Continental Divide National Scenic Trail, DRAFT Guidance: Managing Trail Uses”

