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June 1, 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]](#footnote-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]](#footnote-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.”

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 to correctly reflect the corridor on maps and Forest information resources. We would also suggest including any proposed Trail realignment corridors so that in the process of evaluating forest resources both current and future Trail locations may be protected.
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:
11. 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.
12. 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.
13. 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.

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

**Proposed Roadless Areas, Wilderness Additions and other Special Areas**

CDTC would like to see the Forest Plan recognize the distinctive roles and contributions the alpine peaks and backcountry opportunities that distinguish the GMUG from the surrounding landscape, and the capability of the GMUG to contribute to landscape scale network of protected lands derived from its large roadless base.

For the past two years, citizens came together to craft a [Citizen Conservation Proposa](https://www.gmugrevision.com/)l for the GMUG National Forest. The citizens are active members of Continental Divide Trail Coalition, High Country Conservation Advocates, The Wilderness Society, Great Old Broads for Wilderness, Sheep Mountain Alliance, Ridgeway-Ouray Community Council, Western Colorado Congress, Western Slope Conservation Center, and San Juan Citizens Alliance, and they live, work and recreate in the GMUG region. They know the wild lands extremely well having, in some instances, hiked and skied for decades in the forest’s backcountry. In crafting the proposal, these citizens visited the proposed areas, took photographs, drove boundaries, and met with community members. They worked hard (and are continuing to do so) to make sure exclude areas where potential conflicts might arise – e.g., currently utilized motorized and mechanized trails. The citizens regard the proposal boundaries as dynamic; they are continuing to talk with community organizations and members, and will refine boundaries if conversations reveal genuine conflicts of which they were not aware.

The Citizen Conservation Proposal consists of 33 areas (containing 43 units) that warrant conservation protections in the revised forest plan because of their recreational, scenic, or ecological importance. Twenty-seven of the units are recommended for wilderness (12 are stand-alone and 15 are additions to existing wilderness), 12 are proposed as special interest areas, two are proposed as wildlife linkages, one is an important bird area, and one is proposed as a watershed protection area for the Grand Junction watershed. The Citizen Proposal covers the Uncompahgre Mountains and Plateau, the Grand Mesa, a small portion of the western West Elks, and the mountains of the southeastern Gunnison Basin. The remainder of the national forest lands within Gunnison County are captured in a conservation proposal crafted by the [Gunnison Public Lands Initiative](https://www.gunnisonpubliclands.org) (GPLI), a community-based collaborative consisting of a wide range of stakeholders. CDTC strongly urges the Forest Service to adopt the Citizens Conservation Proposal and the collaboratively developed GPLI proposal in its preferred alternative.

**Recommendation**: In its draft EIS and land management plan, the GMUG National Forest should:

* Adopt in its preferred alternative the conservation designations in the Citizen Proposal and the GPLI Proposal.
* Identify and designate a network of conservation watersheds designed to protect and maintain the most intact aquatic systems as well as restore degraded watersheds of high importance for stewardship of fish and aquatic resources over long periods of time.
* Ensure a broad range of conservation designations across the draft EIS alternatives. At least one alternative should recommend all, or almost all, of the qualifying areas for wilderness, while at least one other should include all the areas (recommended wilderness and other conservation designations) included within the Citizen Proposal and GPLI Proposal.
* Analyze how each alternative contributes to ecological integrity, the diversity of plant and animal communities, and climate change adaptation.
* Ensure plan components for recommended wilderness areas maintain the suitability of future designations by disallowing non-conforming uses. Establish a standard to categorize recommended wilderness as primitive or semi-primitive non-motorized, and another standard to require that the areas be managed to maintain, restore, and enhance those settings.
* Ensure plan components for Colorado Roadless Areas maintain or improve roadless characteristics.
* Assign places with wildernesscharacteristics that are not recommended for wilderness to management or geographic areas that will maintain their unroaded character. Areas that are currently non-motorized should be assigned to a primitive or semi-primitive non-motorized ROS setting. Areas should have a desired condition that heralds the lands for their undeveloped character, contribution to biodiversity and landscape connectivity, and quality outdoor recreation and learning opportunities.
* Conduct a comprehensive analysis of the current RNAs in relationship to the policy goals and objectives set forth in FSM 4063, identify gaps in the RNA system and which lands and waters on the GMUG could, if recommended for designation, help fill the gaps. RNAs should be large enough to provide for unmodified conditions and processes in the area’s core, and, to the degree possible, landscape-scale RNAs that incorporate several ecosystem elements. In the draft EIS, analyze and disclose the effects of climate change on the proposed RNA system and explain how the forest is meeting its substantive responsibilities for establishing an RNA system that achieves the identified objectives under each alternative. Establish a forest-wide goal related to RNAs.
* Incorporate into the stated Needs for Change a need to identify additional designations that enhance ecological sustainability, biodiversity, research opportunities, and backcountry recreation.

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

CDTC Director

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

1. CDT Leadership Council Vision and Guiding Principles [↑](#footnote-ref-1)
2. CDNST Study Report Page 18 [↑](#footnote-ref-2)