



Continental Divide National Scenic Trail Management Tool: Managing Recreational Uses

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Purpose

This document serves as a tool to promote consistent management of recreational uses on the congressionally-designated Continental Divide National Scenic Trail (CDT). This is a living document that will be reviewed annually to determine if updates are needed based on lessons learned from implementation. This document contains:

1. Guiding Principles for managing recreational uses on the CDT,
2. A table of considerations for managing authorized special uses on the CDT (Table 1), and
3. A table to assist line officers when making decisions on whether to allow mechanized use, such as bicycle use, on a newly constructed or relocated CDT segment¹ (Table 2).

Scope of this Document

This document generally applies to CDT segments where mechanized use and/or recreation special uses are not expressly prohibited by law or policy.² This document does not create new policy, rather, it clarifies CDT management within existing law and policy, and is consistent with the core values outlined in the Forest Service's National Strategy for a Sustainable Trail System (Trails Strategy).³

Background

National Scenic Trails are to be “so located as 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 through which such trails may pass” (16 U.S.C. 1242(a)(2)).⁴ The CDT's nature and purposes are “to provide high-quality, scenic and primitive hiking and horseback riding opportunities and to conserve the natural, historic and cultural resources along the CDNST corridor” (2009 CDT Comprehensive Plan).

The CDT is a 3,100-mile route following the spine of the Rocky Mountains from Mexico to Canada. It traverses some of the most scenic terrain in the country and areas rich with history of the Rocky Mountain West. The CDT is the highest and most rugged of the eleven National Scenic Trails, reaching the 14,270-foot summit of Grays Peak in Colorado. The CDT connects a diversity of landscapes- from desert to glacier, and remote wilderness to working lands- across portions of New Mexico, Colorado, Wyoming, Idaho and Montana.

The CDT provides for a range of recreational opportunities across diverse landscapes and settings:

- Nearly 34% (1,062 miles) of the Trail is open to hiking and horseback riding only.⁵
- Motorized use is currently allowed on approximately 19% (606 miles) of the CDT.⁶
- Bicycle use is allowed on approximately 66% (2040 miles) of the CDT. This includes 606 miles open to motorized use as well as 1,434 miles of non-motorized trail segments.

¹ The CDT is a continuous route made up of numerous road and trail segments. A segment refers to a portion of the trail with district attributes, for example, when allowed or prohibited uses change, the trail crosses jurisdictional boundaries, and/or the trail is located within a special management area, such as designated wilderness.

² The Wilderness Act of 1964 prohibits mechanized and motorized use within designated wilderness. Most National Park Service units prohibit mechanized and motorized use on trails. Forest Plan direction or travel management decisions may also prohibit such use.

³ The Forest Service is the CDT administering agency. The Trails Strategy outlines core values and actions to develop and sustain a vibrant and healthy trail system by embracing changes and refocusing the way the agency connects people to their public lands.

⁴ National Trails System Act, P.L. 90-543, as amended. 16 U.S.C. 1242(a)(2)

⁵ CDT segments within designated wilderness, wilderness study areas closed to mechanized and motorized use, NPS units (except a 2-mile segment within Rocky Mountain National Park), and a 16-mile segment in CO between Cottonwood and Tincup Passes.

⁶ All trail miles based on 2018 Forest Service GIS data. The CDT follows 452 miles of roads and 154 miles of motorized trails.

The National Trails System Act (NTSA) prohibits motorized use on national scenic trails, with a few exceptions, such as for emergency use or to provide landowner access (16 U.S.C. 1246(c)). The NTSA provides an additional exception for the CDT: The types of motorized use that existed on CDT segments at the time of the Trail’s designation, and which do not substantially interfere with the nature and purposes of the Trail, are allowed to continue (16 U.S.C. 1244(a)(5)). Regarding mechanized use, the NTSA lists bicycle use as a potential trail use allowed on designated components of the national trails system (16 U.S.C. 1246(j)), and the 2009 CDT Comprehensive Plan states “mountain bike use may be allowed if such use is consistent with applicable land management plan direction and does not substantially interfere with the nature and purposes of the Trail“(2009 CDT Comprehensive Plan Sec. IV.5(b)(2)).

See Appendix A for law and policy references regarding trail uses on the CDT.

TEN GUIDING PRINCIPLES

These Guiding Principles derive their content from the relevant law and policy pertaining to the CDT as referenced in Appendix A, and the core values and actions outlined in the Forest Service’s Trails Strategy.⁷ These Guiding Principles also advance the Forest Service’s national priority of “Enhancing recreation opportunities, improving access, and sustaining infrastructure.”⁸

1. Promote Connection to the Outdoors: The National Trails System was established in order to provide for the ever-increasing outdoor recreation needs of an expanding population and to promote public access to, travel within and enjoyment and appreciation of the outdoors (16 U.S.C. 1241(a)). The Act was inspired by the idea people need to be in nature and experience natural beauty. The CDT provides opportunities for visitors to connect with nature and our nation’s history amidst the highly scenic landscapes along the Continental Divide.
2. Protect the Trail Experience and Setting:
 - a. Trail travelers can wind their way through some of the most spectacular scenery in the Nation, and enjoy the cultural, historic, and natural qualities of the expansive and varied landscapes unique to the Continental Divide.
 - b. The CDT provides a range of recreational opportunities from easily accessible day trips to extended adventures of varying lengths. The trail is to be primarily managed for hiking and horseback riding use, though other non-motorized uses may be allowed. The trail should be developed and managed to encourage slow to moderate speeds of travel.
 - c. CDT managers should focus on maintaining a naturally appearing setting with minimal visual intrusion from facilities or other development. Scenery along the trail should be conserved or enhanced. The CDT should be well maintained, signed and passable, and developed to no higher standard than necessary to safely accommodate the amount and types of use anticipated on any segment.
3. Embrace Diversity: The CDT is the thread that binds together a diverse mix of trail and land uses across a variety of landscapes and settings. The CDT has a unique history and culture, and is managed to reflect the landscapes, communities and cultures it traverses. CDT managers recognize the importance of engaging diverse constituencies and that the CDT community is strengthened by the combined effort of many minds and hands.
4. Foster Trail Stewardship: Volunteer engagement is an important aspect of the National Trails System (16 U.S.C. 1241(c)), and a key component of CDT management. Managing Agencies are increasingly reliant on partners and volunteers to assist with CDT maintenance. Volunteer trail maintenance and stewardship help accomplish meaningful work on the trail while fostering a sense of pride and connection to public lands.
5. Make Local Decisions Within a Trail-wide Framework: The Oct 16, 2009 letter from Maribeth Gustafson, R2 Deputy Regional Forester, to CDT Forest Supervisors clarifies: “While the [2009 Comprehensive Plan] amendment establishes hiking and horseback riding as the primary uses of the trail, it leaves the decision

⁷ The CDT Guiding Principles specifically embrace the core values of safety, sustainability, commitment, access, inclusion, open communication and collaborative relationships, and make progress under numerous Actions identified in the document within the areas of Relevancy, Sustainable Systems, Agency Culture, and Information.

⁸ <https://www.fs.fed.us/inside-fs/leadership-intentions-usda-forest-services-five-national-priorities>

⁹ Derived from language in the 1976 CDT Study Report and 2009 CDT Comprehensive Plan.

regarding what uses will be allowed on individual sections, including hiking, horseback riding and mountain biking, to the local line officer. Decisions on the type of use allowed must be based on a thorough NEPA analysis that considers shared use as a viable option.” Decisions to allow shared use would be based on a conclusion that such use would not substantially interfere with the nature and purposes of the CDT. Forest Supervisors are responsible for deciding whether to allow mechanized use on the CDT (FSM 2353.04i(13)(b)).

6. Promote Harmony Amongst CDT Users: The overarching management goal should be to promote harmony and cooperation amongst trail users. CDT managers and trail users can employ a variety of approaches to minimize, avoid, or resolve conflict amongst trail users. These may include, but are not limited to: proper trail design, encouraging user groups to self-regulate and promote common trail use ethics, providing information on which types of trail uses to expect on a given CDT segment, and encouraging and educating ALL trail users to practice trail etiquette. Alternate or parallel routes may be a tool to help accommodate different trail uses.
7. Avoid Substantial Interference:¹⁰ When making substantial interference determinations, consider the extent to which the proposed action would: i). Affect the purposes for which the trail was designated; ii). Result in long-term or permanent disruption to the continuous nature of the trail; iii). Affect opportunities for maximum outdoor recreation potential, and iv). Affect the conservation or enjoyment of resources, qualities, values, and associated settings of the areas through which the CDT may pass, including noteworthy characteristics or landforms of the region.¹¹
8. Clarify Desired Conditions to Facilitate Monitoring and Adaptive Management: Clear articulation of the desired conditions for the physical, social and administrative settings for CDT segments will help inform decisions on allowed uses and substantial interference determinations, and provide a foundation for identifying meaningful indicators for future monitoring efforts.
 - a. Desired conditions may vary among CDT segments within the sideboards of the purposes of the NTSA and CDT policy. Project level environmental analysis should describe the unique recreational opportunities and setting characteristics provided by the trail segment (connecting loop opportunities, scenic values, close to home exercise, etc), potential for substantial interference, and actions that would avoid, reduce or mitigate potential negative impacts. Also describe the physical and administrative settings (e.g. consider signage needs, trail design, scenery, and educational efforts).
 - b. CDT units are encouraged to employ adaptive management strategies to respond to deviations from desired conditions.¹² Managers have a suite of tools available, and stakeholders can be an important partner in helping managers monitor conditions and implement adaptive management strategies. Consider using crowd-sourced data to inform monitoring efforts.
9. No New Motorized Uses: Per 16 U.S.C. 1246(c), motorized use would not be allowed on future relocated or newly constructed Trail segments.¹³
10. Be Good Neighbors and Support Alliances with Local Communities: The CDT connects many rural communities along the Continental Divide, and has the potential to contribute to local economies through recreation tourism. Managers should be cognizant of potential effects to local communities when contemplating management actions on the CDT, and support the Continental Divide Trail Coalition’s Gateway Community Program, which aims to facilitate economic development while engaging community citizens as trail visitors and stewards.

¹⁰ Per Section 7(c) of the NTSA, “National scenic or national historic trails may contain campsites, shelters, and related-public-use facilities. Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary responsible for administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purpose for which such trails were established.”

¹¹ From BLM Policy Manual 6280: Management of National Scenic and Historic Trails, Ch.1.6(A)(3)(ii).

¹² Rocky Mountain National Park’s East Shore Trail FONSI is a good example of an adaptive management strategy to address visitor conflicts and/or resource damage that may develop over time.

¹³ The type and class of motorized use that existed at the time of the CDT’s designation may continue as long as such use does not substantially interfere with the nature and purposes of the trail. Motorized use is designated through local travel management decisions.

**Table 1: Authorizing Special Uses on the CDT:
Considerations to Assist with Environmental Analysis and Decision-Making**

Recreation special uses such as recreation events, Outfitter and Guide Activities, and shuttle services can provide many benefits to communities and visitors, including direct benefits to the CDT.

- Permitted activities may be authorized if they do not substantially interfere with the nature and purposes of the trail and are consistent with desired conditions for the given trail segment.
- Permit holders should be encouraged to act as citizen stewards who “give back” through service projects outside the scope of their special use permit.

This table provides a framework for evaluating compatibility of proposed or potential recreation special uses with the **nature and purposes of the CDT: Highly scenic, primitive physical setting; high quality hiking and horseback riding opportunities; and conservation of the cultural, historic and natural qualities of the trail corridor.**

Consider the following within the context of the Ten Guiding Principles above:

1. Consistency with Law and Policy? Is the proposed use or activity compatible with the National Trails System Act, 2009 CDT Comprehensive Plan and other agency policy pertaining to national scenic trails?

2. Is there a compelling reason why the use should occur on the congressionally-designated CDT as opposed to another trail or trails?

Extra consideration for Competitive Recreation Events: Since such events generally promote faster forms of travel, there is greater potential for interference with other trail users’ enjoyment of this congressionally-designated trail (see nature and purposes statement and Guiding Principle #2a). Explore whether other trails might meet the needs of the applicants before deciding to issue permits for such use on the CDT.

3. Negative Resource Impacts? The CDT requires an extra level of care, with emphasis on conservation of the natural, scenic, historic and cultural resources along the Trail and Trail corridor. Assess how the activity may affect the natural environment, and what mitigation measures or operating plan requirements could be put in place to avoid potential impacts.

4. Negative Impacts to Other Trail Users? What are the social concerns associated with the proposed use or activity, such as user conflicts, displacement, or safety issues? Can these be mitigated? If so, how?

Extra considerations for Competitive Events- How many participants are proposed, and how much time (number of hours and/or days) would the event take place on the trail and potentially affect other trail users? Would the event occur during popular use periods and potentially displace other CDT users?

Consider adjusting the timing of the activity to avoid busy use periods, consider weekday vs weekend use, whether there is a need to provide access points for spectators, pulse starts to minimize the number of participants on the trail at once, and total participant numbers. Also consider periods in which you’d pause event activities to allow trail users to pass through.

5. Benefits? What benefits might the proposed use or activity provide to the CDT, trail users, and local communities? Would the proposed use or activity complement current and foreseeable future interests and needs?

6. Cumulative Effects? Would the proposed use or activity result in cumulative negative impacts to the trail resource or primary trail users when viewed in light of other past, present, or reasonably foreseeable future uses and activities on the CDT unit and adjacent units?

Extra consideration for Competitive Events: The CDT provides unique and rare opportunities for long-distance travel. How many other events are permitted on the CDT on your unit? On neighboring units? How are these distributed across the short trail use season? Carefully consider how permitting one event may affect the long-distance trail experience in light of other events occurring along the trail.

7. Monitoring? What monitoring is needed to confirm compatibility of the permitted activity with the desired conditions for the CDT segment and the operating plan? How can the monitoring be feasibly accomplished?

To determine indicators to monitor, look at what mitigation factors are included in the operating plan. Some examples of what to monitor include user experiences, trail condition, trash or human waste presence, parking lot capacity at trailheads, and disturbance of sensitive sites.

**Table 2: Allowing Mechanized Use on the CDT:
Considerations to Assist with Environmental Analysis and Decision-Making**

The CDT is to be primarily constructed and managed for hiking and equestrian use. Mechanized use, such as bicycle use, may be allowed on CDT segments if use is consistent with the land management plan and will not substantially interfere with the nature and purposes of the CDT (16 U.S.C. 1246(j); FSM 2353.44b(10); Comprehensive Plan Sec. IV(5)(b)(2)).

Bicycle use is currently allowed on approximately 66% (2040 miles) of the CDT, including 1,434 miles of non-motorized trail segments and 606 miles of motorized trail or road segments.

As we continue to refine the trail's location and relocate the CDT off of roads and motorized routes, where feasible and desirable, there will be a need to determine which trail uses to allow on newly constructed CDT segments. Consider the following when determining whether to allow mechanized use, such as bicycle use, on new or relocated CDT segments, within the context of the Guiding Principles and Nature and Purposes of the CDT:

1. Safety and Sustainability? Do local conditions (e.g. soil type, vegetation and topography) allow for safe and sustainable trail design that would address sight distance and speed factors and allow for safe shared use? The CDT should generally have a designed use of Pack & Saddle, per FSM 2309.18. Where bicycle use is allowed, the CDT should not be designed as a bicycle trail, but should incorporate trail design efforts that strive to provide clear sight lines and encourage travel at slower or moderate speeds.

2. Coincident Route? Is the proposed CDT segment coincident with a route already open to mechanized use? Consider how allowing or prohibiting mechanized use on the proposed CDT segment may affect overall management of the coincident route. Would allowing or prohibiting mechanized use result in discontinuous management on the ground that could be confusing to trail users and difficult to manage?

3. Connectivity? Consider how allowing or prohibiting use on the proposed segment may complement adjacent CDT segments or create potential management issues. Would mechanized use be allowed on either side of this trail segment, or would it lead to an area closed to such use? If allowed uses on the proposed segment would differ from adjacent CDT segments, would there be a clear change in management on the ground? The intent is for management decisions to be clear for trail users to understand and comply with.

Would a portion of the CDT enable loop opportunities or key connections with other trails open to mechanized use? The CDT may serve a unique role as a connector between local trails, as long as the use is managed to promote harmony amongst trail users. On the other hand, consider whether other existing or potential future local trails may fill the need for mechanized use opportunities, especially if high use levels are anticipated on the proposed CDT segment. Consider how the CDT may fit into future local trail planning efforts.

4. Adaptive Management¹⁴ and Monitoring? Do recreation use trends indicate high recreation use levels (relative to current local levels) on a given segment within the next 10-year period? If so, analyze capacity to implement and maintain management actions necessary to minimize potential use conflicts and resource concerns that may arise.

¹⁴ See Rocky Mountain National Park's East Shore Trail FONSI for a good example of an adaptive management strategy to address visitor conflicts and/or resource damage that may develop over time.

Appendix A: Relevant Law and Policy, and other Information

The National Trails System Act, P.L. 90-543, as amended:

- 16 U.S.C. 1241(a): In order to provide for the ever-increasing needs of an expanding population and in order to promote the preservation of, public access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Nation, trails should be established (i) primarily near the urban areas of the Nation, and (ii) secondarily, within scenic areas and along historic travel routes of the National which are often more remotely located.
- 16 U.S.C. 1242(a)(2): National scenic trails...will be extended trails so located as 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 area through which such trails may pass.
- 16 U.S.C. 1244(a)(5): The CDT... shall be administered by the Secretary of Agriculture in consultation with the Secretary of the Interior. Notwithstanding the provisions of Section 7(c), the use of motorized vehicles on roads which will be designated segments of the [CDT] shall be permitted in accordance with regulations prescribed by the appropriate Secretary.
- 16 U.S.C. 1244(f): [Develop a] comprehensive plan for the management, and use of the trail, including, but not limited to the following: (1) specific objectives and practices to be observed in the management of the trail, including the identification of all significant natural, historical, and cultural resources to be preserved...and for national scenic or historic trails an identified carrying capacity of the trail and a plan for its implementation.
- 16 U.S.C. 1246(c): National scenic trails may contain campsites, shelters, and related public-use facilities. Other uses which will not substantially interfere with the nature and purposes of the trail may be permitted. Reasonable efforts shall be made to provide sufficient access opportunities to such trails, and, to the extent practicable, efforts be made to avoid activities incompatible with the purposes for which such trails were established.
- 16 U.S.C. 1246(c): The use of motorized vehicles by the general public along any national scenic trail shall be prohibited...Provided, That the Secretary charged with the administration of such trail shall establish regulations which shall authorize the use of motorized vehicles when, in his judgment, such vehicles are necessary to meet emergencies or to enable landowners to have reasonable access to their lands or timber rights...Other uses along the historic trails and the Continental Divide National Scenic Trail, which will not substantially interfere with the nature and purposes of the trail, and which, at the time of designation, are allowed by administrative regulations, including the use of motorized vehicles, shall be permitted by the Secretary charged with administration of the trail.
- 16 U.S.C. 1246(j): Potential trail uses allowed on designated components of the national trails system may include, but are not limited to, the following: bicycling, cross country skiing, day hiking, equestrian activities, jogging or similar fitness activities, trail biking, overnight and long-distance backpacking, snowmobiling, and surface and underwater activities.

Policy

2009 CDT Comprehensive Plan: The Comprehensive Plan provides broad-based policy and direction for the development and management of the CDT across all jurisdictions through which the CDT passes.

- Sec. II A: The nature and purposes of the CDT are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve the natural, historic, and cultural resources along the CDT corridor.
- Sec. IV(5)(b)(2): Bicycle use may be allowed if the use is consistent with the applicable land and resource management plan and will not substantially interfere with the nature and purposes of the CDT.
- Sec. IV(8)(b)(1): The CDT is intended to reflect the variety of wildland conditions and uses which make up the overall character of the Continental Divide. The travel route itself will be developed to no higher standard than necessary to accommodate safely the type and amounts of use anticipated or planned for in any given segment.
- Sec. IV(8)(b)(2): Any development of and associated facilities for the CDT should be minimal and appropriate for hiker/pedestrian and pack and saddle stock use.

- Sec. IV(6)(b): Motor vehicle use by the general public is prohibited on the CDT with limited exceptions. The vehicle class and width allowed on segments of the CDT prior to Nov. 10, 1978 may be allowed as long as such use does not substantially interfere with the nature and purposes of the CDT.
- Sec. IV(6)(b): Over-snow vehicle use is allowed in accordance with 36 CFR Part 212, Subpart C, as long as the use will not substantially interfere with the nature and purposes of the CDT.

Forest Service Manual 2350: Trail, River and Similar Recreation Opportunities contains specific policy for management of the CDT on National Forest System Lands, including:

FSM 2353.44b(9)- Forest Service Trail Management Objectives for non-motorized CDT Segments:

- a. Managed uses: Hiking and/or Pack & Saddle
- b. Accepted uses: Bicycle (where allowed)
- c. Designed use: Pack & Saddle (incorporating design elements as necessary to safely accommodate mechanized use, if applicable).
- d. Trail Class: generally Trail Class 2 or 3 (use the minimal design standards necessary to accommodate the intended uses)

BLM Manual 6280: Management of National Scenic and Historic Trails contains policy for management of national scenic and historic trails generally.

NPS Management Policies 2006 contains policy for management of national scenic and historic trails generally, including management in wilderness.

Other CDT tools, guidance and background documents:

- CDT Trail Marking Guide (2017)
- CDT Optimal Location Review Process (2017)
- CDT Forest Planning Guidance for Revision Forests (updated Nov. 2017)
- CDT Leadership Council Statement of Purpose and Guiding Principles (2015)
- 1976 CDT Study Report and 1977 CDT Final Environmental Impact Statement

Excerpts from the 1976 Bureau of Outdoor Recreation Study Report provide insight into the purposes for designating the CDT as a National Scenic Trail:

- [National Scenic Trails] would be the stimulus for, and the major axis of, an extensive network of trails branching out to our most attractive lands, calling attention and urging us to make wise use of our rich natural heritage.
- The primary purpose of [the CDT] would be to provide a continuous, appealing trail route, designed for the hiker and horseman, but compatible with other land uses.
- [The CDT] would make available numerous additional outdoor recreation experiences. Trail users would wind their way through some of the most spectacular scenery in the United States and have an opportunity to enjoy a greater diversity of physical and natural qualities than found on any other extended trail.
- [The CDT] would provide to all those who live in or might visit the Rocky Mountain area an opportunity to enjoy high quality recreation and to refresh themselves by involvement with the outdoors. The extended and continuous nature of this trail would assure the increased availability of recreation resources of this region to more people and access to more of the nationally significant areas along the pathway.
- Establishment and recreational use of [the CDT] would result in significant economic benefits to the communities and regions along the trail.... To the visitor, a Divide trail would be an additional recreation opportunity and tend to enhance the tourist importance of the region.
- One of the primary purposes for establishing the CDT would be to provide hiking and horseback access to those lands where [human] impact on the environment has not been adverse to a substantial degree and where the environment remains relatively unaltered. Therefore, the protection of the land resource must remain a paramount consideration in establishing and managing the trail. There must be sufficient environmental controls to assure that the values for which the trail is established are not jeopardized.