



**CONTINENTAL DIVIDE  
TRAIL COALITION**

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Golden, CO 80401

February 3, 2018

Custer Gallatin National Forest  
Attn: Forest Plan Revision Team  
P.O. Box 130 (10 East Babcock)  
Bozeman, MT 59771

RE: CDTC Comments on Custer Gallatin National Forest Draft Proposed Forest Plan

Dear Forest Plan Revision Team

Thank you for the opportunity to comment on the Draft Proposed Custer Gallatin National Forest Draft Plan. We are happy to assist you with this 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 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 suggest the following language be added to the Plan's "Historical Context" portion of the forthcoming Revised Planning document to allow readers the opportunity to understand the significance of the Continental Divide National Scenic Trail within the 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.<sup>1</sup>

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.”<sup>2</sup>

**CDNST Comprehensive Plan Direction:** 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 this Draft Plan, we offer the following comments:

We understand that this is a Preliminary Draft Plan, with a Draft Plan and Environmental Impact Statement (Draft Plan/EIS) to be released later this year for public review and comment. We note that some Forest Units release Preliminary Draft Plans that contain alternatives to the Proposed Action. While we appreciate the opportunity to review this Preliminary Draft Plan, we cannot fully comment until the Proposed Plan, with alternatives and its draft EIS, is released for public comment.

CDTC recommends that all Alternatives include a Special Management Area for the CDNST. Special Management Area designation is needed to comply with the *CDNST 2009 Comprehensive Plan* and FSM 2353.42 and 2353.44(b). This is also consistent with the September 8, 2016 letter from the Regional Foresters with the CDNST in their region, which states:

“We also expect CDT Forests to designate the CDT Corridor as a management area, or equivalent spatially identifiable area to provide for a consistent approach for establishing management emphasis for the CDT across CDT Forests.”<sup>3</sup>

CDTC strongly supports recognition in the plan under forest wide direction of the CDNST as a corridor. Our suggested revisions of the Plan’s Desired Conditions, Standards, Objectives, etc. found below best support protection of the Trail.

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<sup>1</sup> CDT Leadership Council Vision and Guiding Principles

<sup>2</sup> CDNST Study Report Page 18

<sup>3</sup> Paragraph 3, Letter from Regional forests from Regions 1, 2, 3, and 4 to all Forest Supervisors in their regions who manage the CDT, 9/8/16

## **Preparation of a CDNST Unit Plan**

The Proposed Plan does not specifically call for preparation of a Unit Plan. We encourage the development of a Unit Plan (in accordance with FSM 2353.44b(2)), as a valuable way to further manage and protect the CDNST through the extent of the Custer Gallatin National Forest. A Unit Plan can more clearly identify management parameters for future integrity of the purposes and nature of the CDNST. A Unit Plan would provide the public, partners, and future Forest Supervisors and staff with clear direction tiered from the Custer Gallatin Forest Management Plan. **The Custer Gallatin Forest Management Plan and Unit Plan should strive to address the items called for in FSM 2353.44b(2)(a-f) in enough detail to provide for the management and protection of the CDNST. CDTC recommends the use of a Special Management Area for the CDNST as a way to address these issues.**

We suggest the Unit Plan for the Custer Gallatin National Forest Plan include the following Plan Components:

1. Summary of the legislative history and previous planning efforts for the Continental Divide National Scenic Trail;
2. A detailed assessment and maps of current Trail conditions, including a viewshed analysis, as a baseline;
3. Desired Future Conditions for management of the Trail;
4. Goals, Objectives, and Standards;
5. Management Approaches;
6. Monitoring and Indicators specific to the Continental Divide National Scenic Trail. This would also include incorporation of Scenic Management Objectives and describe existing and potential “external threats” to scenery standards. A Unit Plan would also include specific collaborative efforts to achieve Plan Components within the next five years. This would include existing and potential management agreements with partners and adjoining National Forests.

A Unit Plan or Special Management Area would fully incorporate the December 2017 Optimal Location Criteria for the Continental Divide National Scenic Trail (attached and incorporated herein), as a means of addressing Trail relocations and partnerships with the adjoining National Forests. We offer our expertise and services to assist the Forest Service in creating such a Plan.

## **DESIRED FUTURE CONDITIONS**

**The CDTC generally supports the Plan’s Desired Future Conditions; however, we suggest the following Desired Future Conditions be used to provide direction and consistency in language:**

**DC-CDNST-1:** Viewsheds from the CDNST have high scenic values. The foreground of the trail is naturally appearing, and generally appears unaltered by human activities. The potential to view wildlife is high and evidence of ecological processes such as fire, insects and diseases exists.

**DC-CDNST-2:** The CDNST is a well-defined trail that provides for high-quality primitive hiking and horseback riding opportunities, and other compatible nonmotorized trail activities, in a highly scenic setting along the Continental Divide. The significant scenic, natural, historic, and cultural resources along the trail corridor are conserved. Where possible, the trail provides visitors with expansive views of the natural landscapes along the Continental Divide.

**DC-CDNST-3:** The setting of the CDNST corridor is consistent with or complements a primitive or semi primitive nonmotorized setting. The Trail may intermittently pass through more-developed settings to provide for a continuous route.

**DC-CDNST-4:** The CDNST is accessible from access points that provide opportunities to select the type of terrain, scenery, and trail length, ranging from long-distance to day use, that best provide for the compatible outdoor recreation experiences being sought. Wild and remote backcountry segments of the route provide opportunities for solitude, immersion in natural landscapes, and primitive outdoor recreation. Front-country and more easily accessible trail segments complement local community interests and needs and help contribute to a sense of place.

**DC-CDNST-5:** Use conflicts among CDNST users are infrequent.

**DC-CDNST-6:** The CDNST is well maintained, signed, and passable. Alternative routes are made available in the case of temporary closures resulting from natural events, such as fire, flood or land management activities.

Custer NF includes two additional DC for the CDNST. We suggest these be Standards.

Side trails to the CDNST enhance the experience along the main trail. Side trails are short trails that encompass adjacent attractions.

Trailhead facilities support the uses of the trail (*e.g.*, stock use)

## **OBJECTIVES**

**The CDTC is unclear why the Draft Plan does not include Objectives. We recommend the following Objectives be included:**

**OBJ-CDNST-1:** Complete Trail location, including surveys for the corridor within the Custer Gallatin National Forest.

**OBJ-CDNST-2:** Encourage trail partners and volunteers to assist in the planning, development, maintenance, and management of the CDNST, where appropriate and consistent with the CDNST Comprehensive Plan.

## **STANDARDS**

**The CDTC generally agrees with the Proposed Plan’s Standards; however, many proposed Guidelines should be incorporated as Standards to provide for protection of the Trail corridor, health and safety, and visitor experience. We suggest replacing the Plan’s Proposed Standards with the following language and provisions:**

**S-CDNST-1:** Congressionally designated national scenic trail corridors are not suitable for oil and gas or geothermal energy development, or other leasable mineral activities. *(Note, we suggest wording be added to prohibit energy development within .5 miles of the Trail corridor)*

**S-CDNST-2:** No common variety mineral extraction (e.g. limestone, gravel, pumice, etc.) shall occur on or within the congressionally designated trail corridors. *(Note, we suggest wording be added to prohibit mineral extraction within .5 mile of the Trail corridor).*

**S-CDNST-3:** Motorized events and motorized special use permits shall not be permitted on nonmotorized segments of the CDNST.

**S-CDNST-4:** Management activities in the congressionally designated trail corridors shall be consistent with, or make progress toward achieving high or very high scenic integrity objectives to protect or enhance scenic qualities.

**S-CDNST-5:** Management of the CDNST shall comply with the most recent version of the CDNST Comprehensive Plan. Best available science can be used in lieu of the Comprehensive Plan if the plan is more than 15 years old.

**In addition, we believe the following measure below be Standards, rather than Guidelines:**

**S-CDNST-6:** To retain or promotes the character for which the trail was designated, new or relocated trail segments should be located primarily within settings consistent with or complementing primitive or semi-primitive nonmotorized recreation opportunity spectrum classes. To the extent possible, avoid road and motorized trail crossings and other signs of modern development.

**S-CDNST-7:** To protect or enhance the scenic qualities of the CDNST, management activities should be consistent with, or make progress toward achieving scenic integrity objectives of high or very high within the foreground of the trail (up to 0.5 mile on either side). *(We believe that the term “trail landscape” should be used to avoid confusion between the terminology used in the Plan, i.e., “trail foreground:” “adjacent to the Trail;” “reduce scenic impacts adjacent to the Trail;” etc.)*

**S-CDNST-8:** If forest-health projects result in short-term impacts to the scenic integrity of the trail, mitigation measures should be included, such as screening to reduce short-term impacts to the scenic integrity from management activities adjacent to the trail.

**S-CDNST-9:** In order to promote a non-motorized setting, the CDNST should not be permanently relocated onto routes open to motor vehicle use.

**S-CDNST-10:** Provide adequate trail facilities to accommodate the amount and types of use anticipated on any given segment to provide for visitor health and safety. Facilities provided should be minimal in order to preserve or promote a setting that appears natural. *(We believe this should be a Standard. Language used in the Plan that suggests facilities would not be provided for “human comfort” conflicts with our position that access to water resources for Trail visitors is paramount to the visitor experience.)*

**S-CDNST-11:** New communication sites, utility corridors, and renewable energy sites should not be allowed within the visible foreground (up to one half mile) and middle ground viewshed (up to 4 miles) to protect the scenic values of the trail.

**S-CDNST-12:** Limit linear utilities and rights of way to a single trail crossing per special use authorization unless additional crossings are documented as the only prudent and feasible alternative.

**S-CDNST-13:** New temporary or permanent roads or motorized trail construction across or adjacent to the CDNST should be avoided unless needed for resource protection, private lands access, or to protect public health and safety. This provides for a naturally appearing setting while avoiding visual, aural and resource impacts from motorized use.

**S-CDNST-14:** The use of the CDNST for landings or as a temporary road for any purpose should not be allowed to provide for a naturally appearing setting while avoiding visual, aural and resource impacts.

**S-CDNST-15:** Allow hauling or skidding along the trail only when the trail is collocated with an open road and no other options are available. Apply design criteria to minimize impacts to trail infrastructure.

**S-CDNST-16:** Manage unplanned fires in the foreground (up to one-half mile) of the trail using minimum impact suppression tactics, or other appropriate tactics, for the protection of the congressionally designated trail values. Allow heavy equipment line construction within the corridor only when necessary for emergency protection of life and property.

**S-CDNST-17:** Manage wildfires and prescribed fires within 0.5 mile of trails using strategies and tactics that will minimize impacts and emphasize protection of the congressionally designated trail.

#### **SUITABILITY (MG-SUIT-CDNST)**

While we agree with the two suitability statements, we believe these should be **standards**.

#### **MANAGEMENT APPROACHES**

**The CDTC generally supports the Management Approaches included in the Proposed Plan. However, we have included additional Management Approaches providing clearer, consistent direction for the Trail.**

**MA-CDNST-1:** Protect the CDNST scenic values, consider special-use authorizations for new communication sites, utility corridors, and renewable energy sites that would not be visually apparent within the visible foreground (up to 0.5 mile) and middle ground viewshed (up to four miles). *(We believe this should be a Standard and that the term “Trail Landscape” consistently be used to avoid confusion.)*

**MA-CDNST-2:** Coordinate trail management and activities across unit and jurisdictional boundaries, specifically with the Santa Fe and Rio Grande National Forests and the Bureau of Land Management. *(We suggest deleting the term “Consider” and move this to an Objective.)*

**In addition, we suggest the additional Management Approaches be included in the Plan:**

**MA-CDNST-3:** Develop appropriate measures to protect high-potential sites and segments from deterioration due to natural forces, visitor use, vandalism and other impacts.

**MA-CDNST-4:** Evaluate proposed relocations or new segment locations for the CDNST by using defined optimal location criteria (USFS, 11/17).

**MA-CDNST-5:** Identify and pursue opportunities to acquire lands or rights-of-way in or adjacent to the CDNST corridor.

**MA-CDNST-6:** Consider how activities outside the visible foreground may affect viewsheds and user experiences and mitigate potential impacts to the extent possible. *(We believe there is a need for consistent language regarding visual impacts. We suggest the most protective language should be consistently used—i.e., Activities impacting the Trail landscape (up to 4 miles) shall not be permitted in order to protect the “high to very high” scenic integrity of the Trail.*

**MA-CDNST-7:** Provide consistent signage along the trail corridor at road and trail crossings to adequately identify the trail and provide interpretive signs at key trail entry points and limited historic and/or cultural sites to orient visitors and enhance the visitor experience.

**MA-CDNST-8:** Ensure incident commanders are aware of the CDNST as a resource to be protected during wildfire suppression activities and clearly identify fire suppression rehabilitation and long-term recovery of the trail corridor as high priorities for incident commanders, Burned Area Emergency Rehabilitation team leaders, and post-fire rehabilitation efforts. *(We believe it would be helpful to have all forest fire provisions under Standards, rather than mixing language between MA’s and Standards.)*

**MA-CDNST-9:** Establish appropriate carrying capacity for specific segments of the CDNST, monitoring use and conditions, while taking appropriate management actions to maintain or restore the nature and purposes of the trail if the results of the monitoring or other information indicate a trend away from desired conditions.

## **ADAPTIVE PLANNING, MONITORING AND CARRYING CAPACITY**

**The CDTC notes that the Proposed Plan does not include a section on specific monitoring plans and carrying capacity. Direction for the monitoring phase should include indicators for the Trail as well as disclosure of measures that would be taken should conditions deteriorate from what is defined as Desired Conditions. In addition, it is unclear what the Plan direction is for establishing the Trail's carrying capacity.**

Since 2012 we have documented a dramatic increase both in users of the CDNST. For example, some Trail segments record that the annual number of CDNST thru-hikers (which represent a minute fraction of the total number of visitors on the Trail) has increased from 100 in 2012 to 376 in 2017. Anecdotally, day use has increased even more significantly throughout the entirety of the CDNST. It would be helpful to understand visitor use of the Custer Gallatin NF portion of the CDNST as part of understanding a baseline with which to measure future use against.<sup>4</sup>

We would like to work collaboratively with Forest managers to more fully understand current and projected use of the Trail. In doing so, we believe monitoring and carrying capacity would inform an adaptive management scheme.

We also offer the following language to address monitoring and carrying capacity for inclusion in the Forest Plan:

- 1. Include a monitoring indicator measuring the number of water sources to be developed in the next 5-10 years.**
- 2. Add a monitoring indicator to measure increases in signage and suitable access over the next 5 years.**
- 3. Establish carrying capacity and monitoring with standards and indicators relative to the CDNST.**

### **Scenery Management System, Standards and Objectives**

We support the Proposed Plan's incorporation of the Scenery Management System (SMS) and urge that the CDNST be identified as a "Concern Level 1." We agree with and support the objective to manage the Trail at the "high or very high" level and have included language above to incorporate this as a Standard. The scenery integrity standard should not be subject to a Forest Plan exemption if projects (both FS and external) are proposed. Any proposed revision to the Plan, including adequate National Environmental Policy Act (NEPA) analysis and public

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<sup>4</sup> Annual report CDTC Southern Terminus Shuttle report and annual completion survey report.



comment must be required if impacted scenic resources would diminish the nature, purpose, and landscape of the Trail.

## **CUMULATIVE IMPACT ASSESSMENT**

### **The CDTC strongly urges the upcoming Proposed Plan/Draft EIS include a thorough analysis of cumulative impacts.**

In accordance with NEPA and Council on Environmental Quality regulations, the Draft EIS must adequately analyze cumulative impacts from past, present and reasonably foreseeable future actions. (40 CFR Parts 1500-1508) The analysis must disclose what actions are included in the cumulative analysis and how cumulative impacts would vary across alternatives. By completing a comprehensive analysis, the public and decision makers can make meaningful comments and an informed decision.

Finally, we thank you for the opportunity to comment and participate in the ongoing process to revise the Custer Gallatin Forest Plan. We look forward to working with the entire Forest staff and ensuring the CDNST remains a high quality recreational resource across the Custer Gallatin National Forest. Questions or follow up requests may be sent to me at [tmartinez@continentaldividetrail.org](mailto:tmartinez@continentaldividetrail.org) or by calling me at 303-996-2759.

Sincerely,

Teresa Ana Martinez /s/

Teresa Ana Martinez  
Executive Director  
Continental Divide Trail Coalition

cc: Brenda Yankoviak, CDNST Program Administrator; Jim Wolf, Director Continental Divide Trail Society; Custer Gallatin NF Planner, CDTC Board of Directors

Attachment: Optimal Location Criteria