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November 7, 2019

Cibola National Forest

Attn: Sarah Browne, Forest Planner

2113 Osuna Rd NE

Albuquerque, NM 87113

Dear Ms. Browne,

Thank you for the opportunity to comment on the Cibola National Forest Draft Land Management Plan and Draft Environmental Impact Statement. We are happy to assist you with this process and help you strive for the highest quality outcome possible.

Representing approximately 2,000 members nationwide, the **Continental Divide Trail Coalition (CDTC)** is the 501(c)(3) national nonprofit organization formed in 2012 to work with the federal land management agencies to complete, promote, and protect the Continental Divide National Scenic Trail (CDNST). 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 CDNST. To date, CDTC has been successful in coordinating more than 250,000 hours of volunteer stewardship to maintain and improve the CDNST, building positive relationships with federal land managers and local trail-focused groups, organizing special events to help educate the public about the CDNST, implementing Trail Adopter and Gateway Community programs, and encouraging Congress to continue to appropriate funding for the CDNST in the Forest Service budget.

The CDNST is an important resource across the Cibola National Forest. As one of the Secretary of Agriculture’s fifteen priority areas contained in the 2018 Sustainable Trail Strategy, it is also a nationally significant resource across the entire National Forest System. Since 2017, CDTC has recruited volunteers to steward the trail in the Cibola NF as part of the CDTC Trail Adopter program, strengthening the role that volunteers play on the Mount Taylor Ranger District. To date, CDTC and its volunteers have contributed 1253 volunteer hours valued at $33,400.

It is also important to note that CDTC has recognized the city of Grants as a designated CDT Gateway Community. Along with helping community members grow the local outdoor recreation economy via their connection to the CDT, this relationship has also led to an increase in trail adoption from local community members, including the Cibola Trails Alliance. In 2018, CDTC recruited two Gateway Community Ambassadors, who have since hosted local hikes and events for dozens of locals, including many who had never previously visited the CDT. These ambassadors are a vital part of our work to help ease access to local segments of the Trail and increase the importance of the CDNST as a recreational and economic asset to the local community and to the Cibola National Forest.

The Cibola National Forest provides some of the CDNST’s more moving experiences as the trail traverses a landscape dominated by Tsoodzil (Mount Taylor), an area of vital spiritual and historical significance to the Tribes who have historically stewarded it. The connection to the indigineous communities and cultures of the region help visitors understand that the landscapes along the CDNST are valuable beyond simply a “scenic” trail. In addition, as one of the first large ascents for northbound long-distance travelers of the CDNST, it is a harbinger of what is to come along the fast-approaching Northern New Mexico and Colorado segments of the Trail.

Another important issue affecting the CDNST in and around the Cibola NF is that this area is home to one of the trail’s largest remaining gaps in public ownership. To connect the CDNST between the Socorro Field Office of the BLM and the Cibola NF, the trail is currently routed on state and local highways. In 2016, with support from the Rocky Mountain Elk Foundation, more than 5000 acres of private land were purchased to help complete the CDNST across the forest and it is hoped in the near future that the remaining parcels will be acquired to complete the trail from Pie Town north across the Magdalena Ranger District to the El Malpais National Conservation Area and Wilderness Study Area. CDTC is happy to see that there is direction in the plan to complete the CDNST across the Cibola NF and welcomes the opportunity to continue to partner with federal land managers in this effort.

As noted in the Draft Land Management Plan, the *Continental Divide National Scenic Trail Comprehensive Management Plan* was approved by the U.S. Forest Service and set forth as policy in 2009. This overarching 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.

With these factors in mind, and upon review of this Draft Plan and Draft Environmental Impact Statement, the Continental Divide Trail Coalition offers the following comments. We submit these comments on the Draft Plan/EIS as a follow up to our comments from July 2014 on the Proposed Action.

**CDNST Plan Components**

**We commend the inclusion of the CDNST and its mile-wide corridor as a Designated Area in all action alternatives in this plan.** This designation is required by the CDNST Comprehensive Plan and FSM 2353.42 and 2353.44(b) to help ensure that the CDT remains a “primitive and challenging backcountry trail for the hiker and horseman.” This is also consistent with the September 8, 2016 letter from the Regional Foresters with the CDNST in their regions, 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.”[[1]](#footnote-1)

**Overall, we feel that the plan components for the CDNST as written provide appropriate protection for the trail as a congressionally-designated resource of national significance. We suggest the following changes to ensure that the CDNST is managed within the Cibola NF in a manner consistent with the nature and purposes of the trail throughout the life of the plan.**

**Desired Conditions**

CDTC is in support of **DA-DC-CDNST-2** and **DA-DC-CDNST-3** as written. We suggest the following changes noted in italics:

**DA-DC-CDNST-1:** The Continental Divide National Scenic Trail *is a well-defined trail* *that* provides high-quality scenic, primitive hiking, and pack and saddle stock opportunities. The natural, historic, and cultural resources along the trail corridor are conserved. Other *non-motorized* activities and opportunities are allowed when compatible with the nature and purposes of the trail.

We suggest the addition of the following Desired Conditions:

**DA-DC-CDNST-4:** Use conflicts amongst CDNST users are infrequent.

**DA-DC-CDNST-5:** The trail is well maintained, signed, and passable. Alternate routes are made available in the case of temporary closures resulting from natural events, such as fire or flood, or land management activities.

**DA-DC-CDNST-6:** The CDNST is consistent with a primitive or semi-primitive non-motorized setting and may intermittently pass through more developed settings. The CDNST provides for a continuous route through predominately undeveloped settings.

**Standards**

CDTC is in support of **DA-STD-CDNST-1, DA-STD-CDNST-2, and DA-STD-CDNST-3** as written. We feel that **DA-STD-CDNST-4**, as currently worded, is inconsistent with CDNST management policy. Per 16 U.S.C. 1246(c), the only motorized uses allowed on the CDNST are for administrative use and emergencies, private land access, and those that existed at the time of designation - i.e existing uses. New motorized use would not be allowed on future relocated or newly constructed Trail segments; additionally, newly relocated or constructed segments of the CDNST should not be located on a road or trail designated for motorized use. Therefore, there is no situation that we can envision where the CDNST in the Cibola could legally be opened to motorized uses that don’t already exist, making the phrase “except where the trail is located on a designated road or trail or for administrative or permitted use” redundant and confusing. We suggest substituting this phrase for a more clear alternative so that the Standard reads “New motorized uses shall not be authorized on the Continental Divide National Scenic Trail. Existing motorized use may continue on the CDNST.”

**Guidelines**

CDTC is in support ofthe following proposed guidelines for the CDNST (DA-GDL-CDNST) as written: **3-10, 12-13**, although in order to best protect the nature and purposes of the CDNST, we encourage their inclusion in the final plan as Standards. We recommend important changes to **DA-GDL-CDNST-1** and **DA-GDL-CDNST-11**.

The summary of changes document notes that **DA-GDL-CDNST-1** was previously included as an objective, but was deleted because it is “not in accordance with the 2012 planning rule.” Several other forests, including the Santa Fe NF, have included similar objectives in their draft plans, and CDTC staff do not understand why this wouldn’t be in accordance with the 2012 planning rule. We support the sentiment of **DA-GDL-CDNST-1**, but we feel that, because it includes a specific, time-bound goal, this guideline would be more appropriately included in the final plan as an objective.

**DA-GDL-CDNST-8**: Please add the term “substantial” preceding the term “interference” so that the statement is consistent with Comprehensive plan language.

While we believe the reference in **DA-GDL-CDNST-11** to public land access instead of *private* land access is simply a typo/oversight, the guideline as currently written would encourage new road or motorized trail construction across or adjacent to the CDNST along its entire length of the Cibola, which is obviously not in compliance with the CDNST Comprehensive Plan. It should be rewritten as follows:

**DA-GDL-CDNST-11:** New road or motorized trail construction across or adjacent to the Continental Divide National Scenic Trail should be avoided unless needed for resource protection, provide access to *private* lands, or protect public health and safety.

We also suggest the following wording additions noted in italics:

**DA-GDL-CDNST-2:** To protect or enhance scenic qualities of the Continental Divide National Scenic Trail, management activities should be consistent with the scenic integrity objective of high *or very high* within the foreground of the trail (up to 0.5 miles on either side).

**DA-GDL-CDNST-14:** Use of heavy equipment for fireline construction within the Continental Divide National Scenic Trail *corridor* should not be allowed unless necessary for emergency protection of property and safety.

We also strongly suggest the addition of the following as a Standard or, at minimum, a Guideline:

**DA-GDL-CDNST-15:** To retain or promote the character for which the CDNST was designated, new or relocated trail segments should be located primarily within settings consistent with or complementing Primitive or Semi-Primitive Non-Motorized Recreation Opportunity Spectrum classes. Road and motorized trail crossings and other signs of modern development should be avoided to the extent possible.

**Management Approaches**

CDTC supports **DA-MGAP-CDNST-1** and **DA-MGAP-CDNST-3** as written. We suggest the following addition to **DA-MGAP-CDNST-2** as noted in italics:

**DA-MGAP-CDNST-2:** Provide interpretation and signage where appropriate along the trail, *particularly at road and trail crossings*.

We also encourage the inclusion of several additional management approaches in order to further provide for the protection of trail values and ensure consistent management along its length:

**DA-MGAP-CDNST-4:** Evaluate proposed trail relocations or new trail segment locations using the Optimal Location Review process for the CDNST.

**DA-MGAP-CDNST-5:** Ensure Incident Management Teams are aware of the CDNST as a resource to be protected during wildfire suppression activities. Clearly identify fire suppression rehabilitation and long-term recovery of the CDNST corridor as high priorities for Incident Management Teams, BAER Teams, and post-fire rehabilitation interdisciplinary teams.

**DA-MGAP-CDNST-6:** Establish appropriate carrying capacities for the CDNST, monitor use and conditions, and take appropriate management actions to maintain or restore the nature and purposes of the CDNST if the results of monitoring or other information indicate a trend away from the desired conditions.

**DA-MGAP-CDNST-7:** Coordinate trail management and activities across unit and jurisdictional boundaries, specifically with the Bureau of Land Management Rio Puerco Field Office and the City of Grants.

**DA-MGAP-CDNST-8:** Work with partners, including the Continental Divide Trail Coalition, to promote public education about the history, purpose, and benefits of the CDNST.

**DA-MGAP-CDNST-9:** Identify and pursue opportunities to acquire lands or rights-of-way within or adjacent to the CDNST corridor as they become available.

**DA-MGAP-CDNST-10:** Use side and connecting trails to access points of interest or supply points away from the CDNST.

**Wildlife Connectivity**

Because of the unique nature of the CDNST and its corridor as a 3,100-mile route along the spine of the Continental Divide, CDTC supports consideration of the importance of the CDNST as a connected corridor for wildlife movements. We are encouraged to see protections written into the Draft Land Management Plan of critical habitats and resources for many of the unique and special flora and fauna located along the CDNST. Recognition of the role the CDNST may play in animal movements across many landscapes should be incorporated and at least acknowledged in the Designated Area Standards, Guidelines and Management Approaches. The nature and purpose statement for the CDNST does not merely provide for recreational uses of the CDNST; it also elevates the protection of the nationally significant resources located along its corridor. Additionally, the entire CDNST corridor across the Cibola NF provides for connectivity to aquatic and terrestrial habitats that are critical to flora and fauna of the region. These values and the role the CDNST plays in providing connectivity should be recognized in the management approaches.

**Forestwide Direction**

In addition to plan components specific to management of the CDNST, much of the forestwide direction will also affect the trail and its corridor. CDTC strongly supports the core management themes of this Draft Land Management Plan. The plan components for Cultural and Historic Resources, Recreation, and Scenic Resources complement and reinforce the management direction for the CDNST corridor as provided by the CDNST Comprehensive Plan. In particular, we feel that the repeated emphasis on collaboration with partners and volunteers, tribes, landowners, recreation users, and other Cibola NF stakeholders can only improve management of the forest, and we offer our support wherever it is helpful, whether that be assisting in evaluation of potential CDNST reroutes, building new trail sections, or educating CDNST users about management activities occurring along the trail corridor.

**Water Resources**

CDTC supports **FW-GDL-WRF-17** providing guidance that groundwater should be used preferentially over surface water sources for new or redesigned uses such as livestock, recreation and other forest uses to protect surface water sources which are at risk due to drought while providing for long-term management. One of the more critical issues for the CDNST across the existing location and future proposed locations for the CDNST is access to water resources for Trail visitors. This must be addressed in a sustainable way before new trail routes are open to the public.

**Development of the CDT Across the Cibola National Forest**

As noted and described above, it is important to acknowledge that the CDNST location on the southern end of the Cibola NF will change in the next 10 years. However, we do not see any protection of the proposed route across the Magdalena Ranger District even though trail design efforts have begun. We feel it is an oversight to not include mention of the new CDNST location in the area to ensure that scenic, natural, cultural, and historical resources on the landscape are protected in the future location of the CDNST corridor. Specifically, it is important to map the potential future routes so that proposed actions and projects in the area can be analyzed for any potential impacts that they may have on CDNST values.

**Plan Alternatives**

As noted above, the CDTC supports the establishment of a designated area for the CDNST corridor across all three action alternatives that were considered. Due to the cultural significance of the area to local tribes - vital and often under-represented stakeholders in the management of the CDNST - we also support the creation of the Mount Taylor Management Area as proposed in Alternative B. By emphasizing the protection of cultural, scenic, and natural resources in this area, the draft plan components for this management area do the best job across all four alternatives of recognizing the historic and current importance of tribes in this area’s stewardship and encouraging their engagement in its management.

**Environmental Consequences and Cumulative Impact Assessment**

In accordance with NEPA and Council on Environmental Quality regulations, the EIS must adequately analyze cumulative impacts from past, present and reasonably foreseeable future actions. (40 CFR Parts 1500-1508). As written, the Draft EIS contains an adequate discussion of existing conditions and trends on the CDNST, as well as good qualitative analysis of the impacts within the Cibola NF of the creation of the CDNST corridor in Alternatives B, C, and D. However, the EIS discussion fails to address reasonably foreseeable future actions on the Cibola, including but not limited to the relocation of segments of the CDNST and/or construction of new segments within the life of the plan. Additionally, because the CDNST should be managed as a single entity across jurisdictions per the National Trails System Act, the EIS discussion should also address existing conditions and reasonably foreseeable future actions on adjacent land management units, including the Rio Puerco and Socorro Field Offices of the BLM.

**Other Required Components**

**Adaptive Planning, Monitoring, and Carrying Capacity**

CDTC staff did not find any mention in the Draft Land Management Plan or Draft EIS of monitoring for the CDNST. Since 2012, we have documented a dramatic increase in long-distance users of the CDNST, who represent only a minute fraction of the total number of CDNST users. Our data indicates that, on average, the number of attempted thru-hikes along the CDT has increased by 35% each year since 2013.[[2]](#footnote-2) Anecdotal evidence suggests that day use has seen significant increases along various segments of the trail, but reliable day-use data is harder to come by. It would be helpful to understand visitor use of the Cibola NF portion of the CDNST as part of understanding a baseline against which to measure future use.

We would like to work collaboratively with Cibola NF 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.

CDTC offers 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**

We support the Draft Plan’s incorporation of the Scenery Management System (SMS) and the CDNST’s identification as a “Concern Level 1.” We agree with and support the management of the Trail at a “high” or “very high” level of scenic integrity and appreciate the inclusion of such language as a Guideline in the CDNST Plan Components. The scenery integrity standard should not be subject to a Forest Plan exemption if projects (both FS and external) are proposed.

**Unit Plan**

There is nothing in the Draft Plan that calls for the creation of a Unit Plan for the CDNST. As required by FSM 2353.44b(2), “a CDNST unit plan must be developed for each administrative unit through which the CDNST passes.” The CDNST unit plan must provide for the following (FSM 2353.44b(2)):

a) Identify and display the segments of the CDNST that traverse that unit;

b) Establish a management area for the segments of the CDNST that traverse that unit that is broad enough to protect natural, scenic, historic, and cultural features;

c) Establish the Trail Class, Managed Uses, Designed Use, and Design Parameters for the segments of the CDNST that traverse that unit and identify uses that are prohibited on the segments of the CDNST that traverse that unit;

d) Provide for development, construction, signing, and maintenance of the segments of the CDNST that traverse that unit;

e) Identify and preserve significant natural, historical, and cultural resources along the segments of the CDNST corridor that traverse that unit;

f) Establish carrying capacity for the segments of the CDNST that traverse that unit;

g) Establish monitoring programs to evaluate the site-specific conditions of the segments of the CDNST that traverse that unit.

While the Cibola National Forest Draft Plan includes some of the above elements via the CDNST Plan Components, **CDTC encourages the inclusion in the final plan of either a) a full unit plan for the CDNST or b) a mechanism for the creation of such a plan, in order to ensure compliance with FSM 2353.44b(2).** If the inclusion of a full unit plan is not possible due to capacity restraints, CDTC suggests that the following objective be added to the CDNST Plan Components:

**DA-O-CDNST**: Complete a CDNST unit plan in compliance with FSM 2353.44(b)(2)) within 3 years.

CDTC offers our expertise and services to assist the Forest Service in creating the unit plan.

**Conclusion**

We thank you for the opportunity to comment and participate in the ongoing process to revise the Cibola National Forest Land Management Plan. We look forward to working with the entire Forest staff and ensuring the CDNST remains a high quality recreational resource across the Cibola National Forest. Questions or follow up requests may be sent via email to Amanda Wheelock, CDTC Policy and Communications Manager at awheelock@continentaldividetrail.org or by phone at 303-996-2759.

1. 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 [↑](#footnote-ref-1)
2. Annual report, CDTC Southern Terminus Shuttle report and annual completion survey report. [↑](#footnote-ref-2)