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November 7, 2019

Carson National Forest

Attn: Plan Revision Team

208 Cruz Alta Rd

Taos, NM 87571

To the Plan Revision Team,

Thank you for the opportunity to comment on the Carson 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 Carson 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. The CDTC has a long history of partnership with the Carson National Forest. We have typically partnered to host 1-2 volunteer projects annually, and we also recruit and train volunteers to adopt segments of the CDT as CDTC Trail Adopters. To date, CDTC and its volunteers have contributed 3633 volunteer hours valued at $96,750 to the Carson NF. Most recently, in September 2019, CDTC participated along with other trail partners in the Carson National Forest’s celebration of completion of the entire 100-mile section of the CDNST across the Forest.

The CDNST across the Carson NF is an important section for trail visitors of all types, but specifically for long-distance hikers. This is the last section for northbound thru-hikers before they enter the high mountains of Colorado, and often plays a significant role in decisions to continue northbound, to “flip” north to continue southbound, or temporarily take a break in their trek until the weather and trail conditions cooperate. Because of this, the Village of Chama and the Ghost Ranch Retreat Center benefit from and are frequently visited by long-distance hikers staying in town while they make these decisions and coordinate logistics. It is important to note that CDTC has recognized the Village of Chama 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 Chama Valley Outdoor Club.

Another important consideration for the CDT across the forest is the important role the connected and protected CDNST corridor plays for wildlife species such as elk, mule deer, bobcats, and mountain lions, as well as the future potential of use by Mexican and gray wolves. Overall, the Carson NF plays a vital role in contributing to the overall character and experience of the CDNST. As such, we appreciate the recognition of the CDNST as a Designated Area and provide the following comments to ensure that the CDNST is adequately protected, managed and administered. We submit these comments on the Draft Plan/EIS as a follow up to our comments from January 2018 on the Proposed Action.

**NTRL/CDNST Plan Components**

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.

**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 National Scenic, Historic, and Recreation Trails as written provide appropriate protection for the CDNST as a congressionally-designated resource of national significance. We suggest the following changes to ensure that the CDNST is managed within the Carson NF in a manner consistent with the nature and purposes of the trail throughout the life of the plan.**

**Narrative**

There are some small factual errors in the CDNST narrative section of the NTRL plan components. The CDNST travels through portions of 20 national forests, 4 national park units, and 13 BLM field offices. Additionally, since the initial drafting of this language, the CDNST has been completed in the Carson (thanks to the hard work of many Carson NF staff and volunteers!).

**Desired Conditions**

CDTC is in support ofthe following proposed desired conditions for the CDNST (DA-NTRL-DC) as written: **2-7**. While we support what we believe to be the intention of **DA-NTRL-DC-1** - encouraging non-motorized recreational opportunities along the CDNST that are compatible with the nature and purposes of the trail - we feel that, as written, a line officer could easily interpret this desired condition to mean that mountain biking is actually a part of the nature and purpose of the CDNST, which it is not. While the nature and purposes statement for the CDNST is stated in the narrative, it is not obvious that it is quoted management policy from the CDNST Comprehensive Plan, and not just a sentence interpreting Congress’ intent in designating the trail. To reduce potential confusion, we suggest making it more clear in the narrative that the nature and purposes statement is actually policy for the management of the CDNST, and rewording the desired condition as follows (with changes in italics):

**DA-NTRL-DC-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, *including mountain biking*, are allowed when compatible with the nature and purposes of the trail.

We also suggest the addition of the following Desired Condition to apply to the CDNST. A similar Desired Condition is included in the draft plan for other national scenic, historic, and recreation trails (**DA-NTRL-DC-10**), but is not currently included for the CDNST.

**DA-NTRL-DC-8:** 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.

On a related note, we assume, based on the duplication of **DA-NTRL-DC-5** as **DA-NTRL-DC-9**, that the plan components for “other national scenic, historic, and recreation trails” do not apply to the CDNST. We encourage the inclusion of a statement in this section that makes it clear whether this assumption is, in fact, correct (or not!) so that those implementing the plan will have no doubt as to which plan components apply to which trails.

**Standards**

CDTC is in support of **DA-NTRL-S-1, DA-NTRL-S-2, DA-NTRL-S-4,** and **DA-NTRL-S-5** as written. We suggest the following changes noted in italics:

**DA-NTRL-S-3:** No surface occupancy for *oil and gas* *or* geothermal energy leasing activities shall occur within 0.5 mile either side of the Continental Divide National Scenic Trail.

**Guidelines**

CDTC is in support of **all of the proposed guidelines for the CDNST** (DA-NTRL-G: **1-10**) as written, although in order to best protect the nature and purposes of the CDNST, we encourage their inclusion in the final plan as Standards.

**Management Approaches**

CDTC supports the second management approach for the CDNST as written. The first management approach as currently worded seems to be in direct conflict with **DA-NTRL-G-5**, and we suggest its removal. 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-NTRL-MA-3:** Consider providing interpretation and signage where appropriate along the trail, particularly at road and trail crossings.

**DA-NTRL-MA-4:** Consider evaluating proposed trail relocations or new trail segment locations using the Optimal Location Review process for the CDNST.

**DA-NTRL-MA-5:** Consider ensuring 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-NTRL-MA-6:** Consider establishing 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-NTRL-MA-7:** Consider collaborating with federal, state, tribal, county and local governments, volunteer groups, partners, and adjacent landowners to maintain and manage the CDNST corridor as well as the condition and character of the surrounding landscape, and to support trail users with education on Leave No Trace principles.

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

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

**DA-NTRL-MA-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 purposes 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 Carson 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 and Other Designated Area Plan Components**

In addition to plan components specific to management of the CDNST, much of the forestwide direction will also affect the trail and its corridor. The plan components for Cultural Resources, Recreation, Scenery, and Partnerships 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 Carson NF stakeholders can only improve management of the forest, and we offer our support wherever it is helpful.

**Recreation**

We support **FW-REC-S-1** and **FW-REC-S-2** to establish no new motorized routes in primitive and semi-primitive recreation settings. In addition, we support **FW-REC-G-1** and the guideline that recreation activities, even those along the CDNST, should be compatible with and managed adaptively to minimize impacts to at-risk species and conditions including riparian zones. In addition, we support **FW-REC-G-3** that recreation across the forest be managed to minimize human-wildlife conflicts.

We suggest the inclusion of several Management Approaches similar to those proposed in the Santa Fe National Forest’s draft land management plan in order to better educate and engage the public:

* Collaborate with livestock permit holders and recreationists to resolve conflicts.
* Consider multilingual interpretation in recreation areas popular with non-English-speaking visitors.
* Consider programs to educate the public on land stewardship using minimum impact principles (e.g., Leave No Trace, Tread Lightly, or Don’t Bust the Crust!).
* Develop conservation education, visitor information, and interpretation materials to inform and engage visitors and local communities. These resources are readily available and encourage increased forest stewardship, ecological awareness, visitor orientation, and knowledge of recreation opportunities.

**Maps**

We encourage the revision of Figure A-7 in the Draft Plan (map of designated national trails and scenic byways) to clearly show the CDNST corridor instead of just the trail itself. The Cibola National Forest has done an excellent job of illustrating the CDNST corridor in their DEIS - see <https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd645310.pdf> for an example.

**Wild and Scenic Rivers**

We support the inclusion of the Rio Vallecitos as an eligible Wild and Scenic River.

**Plan Alternatives**

As noted above, the CDTC supports the establishment of a designated area for the CDNST corridor across all four action alternatives that were considered. Due to the significance of the area as a wildlife corridor, and the role that the CDNST can play in providing an uninterrupted protected corridor spanning land manager jurisdictions, **we also support the creation of the San Antonio Management Area as proposed in Alternatives 2, 4, and 5**. We feel that the San Antonio Management Area will enhance the scenic and natural resources found along the CDNST corridor in this area and that its management as proposed is highly compatible with CDNST management policy and objectives.

**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 a good discussion of existing conditions and trends on the CDNST, as well as good qualitative analysis of the impacts within the Carson NF of the creation of a Designated Area for the CDNST in Alternatives 2-5. We commend the inclusion of consideration of cumulative impacts across jurisdictional boundaries.

**Other Comments**

**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 Carson NF portion of the CDNST as part of understanding a baseline against which to measure future use.

We would like to work collaboratively with Carson 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.

Additionally, we suggest the inclusion of the CDNST in Table 13: “Monitoring questions and associated indicators that evaluate the status of visitor use, visitor satisfaction, and progress toward meeting recreation objectives,” on page 188 of the Draft Land Management Plan. Monitoring questions related to the Desired Conditions for the CDNST could include the following:

* Are visitors aware of the CDNST corridor and its nature and purposes?
* What are the trends in usage of the CDNST? Are conflicts among CDNST users increasing or decreasing?
* Do visitors feel that the CDNST provides a high-quality, primitive experience?

Indicators could include visitor satisfaction surveys, dispersed campsite monitoring, and trail user counts via registers or other methods.

**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 Carson 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-NTRL-O**: 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 Carson 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 Carson 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)