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Santa Fe National Forest

Attn: Forest Plan Revision Team

11 Forest Lane

Santa Fe, NM 87508

To the Plan Revision Team,

Thank you for the opportunity to comment on the Santa Fe 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 Santa Fe National Forest contains 42 miles of the CDNST and begins at the boundary with the Carson National Forest at the head of Joaquin Canyon four miles north of the Chama River. The CDNST then travels through Ojitos Canyon, crossing Highway 64 near the Coyote Ranger DIstrict Office and then heads over the San Pedro Parks Wilderness and through the Nacimiento mountains. In September of 2019, ten new miles of the CDNST were added in the Santa Fe National Forest and mark the beginning of a thirty mile relocation of the CDT that will move the southern sections of the CDNST off of a highway walk through Cuba, NM. This relocation has taken nearly ten years of planning, will be ongoing over the next three years, and requires coordination with the Bureau of Land Management Rio Puerco Field Office. Once completed, the CDNST will provide a more scenic and primitive experience for trail visitors, and provide countless opportunities for the Village of Cuba to realize impacts to their local economy. CDTC has designated the Village of Cuba as an official CDT Gateway Community, and we are currently working with Cuba to develop tourism products and resources to help market it to local, regional, and out-of-state visitors.

CDTC has also recruited volunteer CDTC Trail Adopters and other volunteer stewards to contribute to the maintenance of the CDNST in the Santa Fe NF. To date, CDTC has provided nearly 1500 hours of volunteer labor on the Santa Fe National Forest valued at $39,790. These contributions will only increase as the CDNST is moved off of highways and onto native surfaces.

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 April 2018 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 Santa Fe NF in a manner most consistent with the nature and purposes of the trail throughout the life of the plan.**

**Narrative**

The narrative section contains a statement about the basic goal of the trail from the 1976 study report. We suggest the addition of the nature and purposes statement[[2]](#footnote-2) from the 2009 Comprehensive Plan to ensure that managers are aware of the most current and relevant direction for the CDNST.

**Desired Conditions**

CDTC is in **support of all of the proposed desired conditions for the CDNST** (DA-CDNST-DC) as written.

**Objectives**

CDTC **supports the stated objective for the trail** and offers our assistance in locating, building, and maintaining these segments of trail. Because forest plan revision rarely happens in the recommended 10-15 year time frame, we encourage the objective to be revised as follows:

**DA-CDNST-O-1:***Within 10 years of the adoption of the plan*, connect the remaining unconnected segments (5 miles on NFS lands and approximately 7 miles within San Pedro Parks Wilderness) in the Cuba Ranger District.

**Standards**

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

**DA-CDNST-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 except for DA-CDNST-G-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.We suggest the following revision noted in italics to best maintain the scenic and aural integrity of the CDNST:

**DA-CDNST-G-10:** *The CDNST* should not be used for landings (e.g., timber, slash, decking) or as a temporary road. Hauling or skidding along the trail itself should be allowed only when design features are used to minimize impacts to the trail and infrastructure and:

1. Where the CDNST is currently located along an open road, and
2. No other haul route or skid trail options are available.

**Management Approaches**

CDTC supports the management approaches for the CDNST, and recommends the following small adjustments noted in italics to encourage the inclusion of all CDNST stakeholders in its management and ensure consistent management along its length:

**DA-CDNST-MA-1:** Work with volunteer groups, partners, *federal, state, tribal, and* local governments, and adjacent landowners to maintain CDNST corridors, the condition and character of the surrounding landscape, and to facilitate CDNST user support that promotes ‘Leave No Trace’ principles and reduces user conflict.

**DA-CDNST-MA-5:** Consider evaluating proposed trail relocations or new trail segments *using the Optimal Location Review process for the CDNST, including* to locate the CDNST as close as possible to the geographic Continental Divide.

**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. The San Pedro Parks area of the CDNST corridor has high value as wildlife habitat. Additionally, the entire CDNST corridor across the Santa Fe 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, Scenic Resources, and Partnerships complement and reinforce the management direction for the CDNST corridor as provided by the CDNST Comprehensive Plan. In particular, we support the repeated emphasis on collaboration with partners and volunteers, tribes, landowners, recreation users, and other Santa Fe NF stakeholders, as this can only improve management of the forest, and we offer our support wherever it is helpful.

We feel that the **Management Approaches for Recreation** are particularly well thought-out in their consideration of various user groups, livestock permittees and adjacent landowners, educational needs of the surrounding communities, and protection of resources from recreation impacts. Similarly, the **plan components as proposed for Dispersed Recreation**, and in particular the proposed Guidelines, provide strong direction for the protection of natural resources on the forest, and are in direct agreement with the nature and purposes of the CDNST (“conserve natural, historic, and cultural resources along the CDNST corridor”).

We suggest the following change (noted in italics) to **FW-SCENIC-DC-3** in order to explicitly recognize the role the CDNST plays in providing high-quality scenic views to Santa Fe NF visitors:

**FW-SCENIC-DC-3:** High-quality scenery dominates the landscape in areas the public values highly for scenery (such as *the Continental Divide National Scenic Trail*, scenic byways, major roads and trails, developed recreation sites, backcountry areas, and high scenic integrity areas such as Wilderness, recommended wilderness and additions, wild and scenic rivers, and inventoried roadless areas).

In addition we would like to encourage the Forest to utilize the soon to be completed Scenic inventory and Assessment for the CDNST in order to map scenic resources along the CDNST.

**Cross Boundary Management (FW-XBOUND)**

The forestwide direction for Cross Boundary Management is critical to the management of the CDNST, as the trail connects the Santa Fe National Forest to the Carson National Forest to the north, and to the Bureau of Land Management Rio Puerco Field Office to the south. CDTC supports **FW-XBOUND-MA-1** “to support collaborative relationships with adjacent landowners, users and public land managers actively and to be encouraged to develop contiguous road and trail systems across multiple ownerships.” Because of the proposed relocation of the CDNST across the Cuba Ranger District in the next three years, this approach will be critical to the success of this important effort. Providing this approach for line officers and staff to support their work to help complete the CDNST is critical.

CDTC supports **FW-XBOUND-MA-3** to work with interested stakeholders to identify suitable parcels for acquisition and explore funding opportunities that leverage LWCF, grant opportunities and other private financing. It is this type of approach that will allow the cooperative partners involved in the management and administration of the CDNST to create innovative and creative solutions to CDNST completion in the Santa Fe National Forest and help us meet the nature and purposes for which the CDNST was created.

**Roads**

The forestwide direction for Roads included in the plan provides good direction that will also help provide appropriate protection of the CDNST across the Forest. This includes **FW-ROADS-S-2** “new motorized routes or areas must not be constructed in areas designated as primitive in the Recreation Opportunity Spectrum.” In addition, we are happy to see **FW-ROADS-MA-2**, which states “within project areas, to prioritize decommissioning of roads and routes that are abundant, adversely impact flow regimes or cause resource damage.” This approach will provide managers with tools in future decisions for areas around the CDNST that may be impacted by new roads or other types of motorized use and ensure that the Trail remains as primitive as possible, while meeting demands placed on forest resources for other types of recreation or access.

**Wild and Scenic Rivers**

The CDNST in the Santa Fe National Forest also connects to the Rio Chama along the section designated WIld and Scenic, and includes the wild and scenic eligible Rio Puerco, Rito Anastacio and Rio de las Vacas watersheds. A Management Approach should be added to acknowledge the connection and proximity of the CDNST to these resources and the importance of the trail in telling the story of watersheds across the North American continent.

**DEIS**

**Environmental Impacts 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 good qualitative analysis of the potential impacts to the CDNST and its corridor from various actions proposed in Alternatives 1-4. We commend the inclusion of consideration of cumulative impacts across jurisdictional boundaries.

**Maps**

As noted above, the CDTC supports the establishment of a designated area for the CDNST corridor across all three action alternatives that were considered. We encourage the revision of Figure 3 in the DEIS (map of designated national trails) 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. We also encourage the inclusion of the CDNST corridor in Figure 6-west, 8-west, 10-west, and 12-west in the DEIS, as scenic values of the CDNST corridor may be affected by the adoption of the various management areas considered in these maps.

**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.[[3]](#footnote-3) 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 Santa Fe NF portion of the CDNST as part of understanding a baseline against which to measure future use.

We would like to work collaboratively with Santa Fe 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 Santa Fe 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-CDNST-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 Santa Fe 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 Santa Fe 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. “The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor.” [↑](#footnote-ref-2)
3. Annual report, CDTC Southern Terminus Shuttle report and annual completion survey report. [↑](#footnote-ref-3)