



CONTINENTAL DIVIDE TRAIL COALITION

710 10th Street Suite 200
Golden, CO 80401

July 27, 2019

Grand Mesa, Uncompahgre, and Gunnison National Forests
Attn: Mr. Jerry Krueger, Acting Forest Supervisor, and Forest Planning Team
2250 South Main Street
Delta, CO 81416

Dear Acting Forest Supervisor Krueger and Planning Team:

Thank you for the opportunity to provide feedback on the working draft of the revised Forest Plan. We are happy to assist you with this process and help you strive for the highest quality outcome possible, and we eagerly await a formal comment period that will allow us and other GMUG stakeholders to provide official feedback for the public record. We urge the Forest Service to also include all comments received on this working draft in the public record for this project. This letter is a follow-up to our previously submitted comments on the various phases of the planning process, including:

- Scoping Comments-April 2018
- Wilderness Criteria Comments-March 2018; August 2018
- Scenery, Recreation and Designated Area Assessments Comments-June 2018

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). The CDNST was designated by Congress as a National Scenic Trail in 1978. This 3,100-mile trail follows the Continental Divide and traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West.

The CDNST passes through Montana, Idaho, Wyoming, Colorado, and New Mexico, and is administered by the U.S. Forest Service in cooperation with the NPS, BLM, and Tribal, state, and local governments, as well as numerous partner groups including the CDTC. 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 *Continental Divide National Scenic Trail Comprehensive Management 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.

With these factors in mind, and upon review of this working draft of the revised Forest Plan, the Continental Divide Trail Coalition offers the following comments.

Our previous letters (as noted above) included the following recommendations that the Forest Management Plan include the following background on the CDNST to provide context for proposed management approaches potentially impacting the CDNST for the life of the plan:

Background and Description

The CDTC encourages the inclusion of some background information about the CDNST in order to provide context for proposed management approaches potentially impacting the CDNST, as well as to underscore the importance of this congressionally-designated resource of national significance. At a minimum, language that clearly identifies the CDNST as a congressionally-designated resource and references the nature and purposes of the trail – such as that which was used in the Revised Forest Plan Assessment for Designated Areas¹ - should be included. We suggest the inclusion of the following language:

The Continental Divide National Scenic Trail (CDNST) was designated by Congress in 1978 (16 U.S.C. §1244). The CDT is a 3,100-mile continuous path that follows the spine of the Rocky Mountains from Mexico to Canada, traversing some of the most scenic terrain in the country and areas rich in the heritage and life of the Rocky Mountain West. The CDNST is the highest and most rugged of the national scenic trails, and 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 nature and purposes of the CDNST are to provide for high-quality, scenic and primitive hiking and horseback riding opportunities and to conserve the natural, historic, and cultural resources along the CDNST corridor (CDNST Comprehensive Plan, approved September 28, 2009 by Chief Tom Tidwell). The trail is to be managed to provide for its nature and purposes. Activities that would substantially interfere with the purposes for which the trail was designated should be avoided to the extent practicable (16 U.S.C. §1246). The overarching management direction for the CDNST is outlined in the *Continental Divide National Scenic Trail Comprehensive Management Plan* (2009 or most current version).

We also strongly encourage the inclusion of a more specific description of the trail locally, such as that which was used in the Revised Draft Forest Assessments:

“Approximately 130 miles of the CDNST traverse the Gunnison Ranger District of the GMUG National Forests, from the district’s southern boundary with the Rio Grande

¹ USDA Forest Service, Grand Mesa, Uncompahgre, and Gunnison National Forests. 2018. Revised Draft Forest Assessments: Designated areas. 70 pp. Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573536.pdf

National Forest along its eastern boundary with the Pike-San Isabel National Forest and north to the White River National Forest. The trail frequently crosses the geographic divide between the adjacent forests.”

CDTC offers its assistance in refining this local description of the CDNST in the GMUG if more details are desired for inclusion in the plan.

Plan Components

While this working draft provides some plan components for management of the CDNST, we believe that the CDNST Plan Components included in this working draft fall short of fully protecting the nature and purposes of the CDNST, in large part because the Standards as written fail to protect against a wide array of activities that may degrade the scenic, natural, cultural, and historic resources of the CDNST corridor.

Our previous comments included planning recommendations based in large part on the *CDNST Comprehensive Management Plan* as well as the Recommended Forest Plan Components for the CDNST (2016, attached). Many of these recommended plan components are not referenced in the working draft, despite their utility in providing for consistency in CDNST management across Forests and agencies.

To provide appropriate protection for the CDNST as a congressionally-designated resource of national significance, as well as to ensure that the CDNST is managed within the GMUG NF in a manner consistent with the nature and purposes of the trail, we suggest that the following changes be made to the language used in the working draft.

Desired Conditions

CDTC is in support of **FW-DC-DTRL-02** as written. We suggest the following changes noted in italics:

FW-DC-DTRL-01: *Consistent with the CDNST Comprehensive Plan, the Continental Divide National Scenic Trail is a well-defined trail that provides for high-quality primitive hiking and horseback riding opportunities, and other compatible non-motorized 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. See also Scenery FW-GDL-SCNY-03.

FW-DC-DTRL-03: The Continental Divide National Scenic 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.*

In addition, we suggest the inclusion of several additional desired conditions as included in the Recommended Forest Plan Components for the CDNST:

FW-DC-DTRL: Viewsheds from the CDT have high scenic values. The foreground of the trail (up to 0.5 mile on either side) 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 exist.

FW-DC-DTRL: The CDT corridor's setting is consistent with or complements a primitive or semi-primitive non-motorized setting. The CDT may intermittently pass through more developed settings in order to provide for a continuous route.

FW-DC-DTRL: Use conflicts amongst trail users are infrequent.

Objectives

We applaud the identification and inclusion of the objective to relocate the CDNST off of roads within 10 years of plan approval. However, we suggest that this objective be modified to complete relocation off of roads within five years of plan approval. We also recommend that the following objectives be included so that progress toward the desired conditions can be measured:

FW-OBJ-DTRL: Complete the CDNST within the Grand Mesa, Uncompahgre, and Gunnison National Forests using the Optimal Location Review process, including surveys for the corridor, identification of private land needs, if any, and engagement of partners to complete trail construction projects where feasible.

FW-OBJ-DTRL: Utilize 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 working draft identifies four standards for the CDNST. We are in general agreement with the included standards as written. However, the continued allowance of existing motorized use events should only be approved after careful analysis of impacts, as well as a determination if the event causes substantial interference to the nature and purposes of the Trail. We urge the Forest Service to include this documentation in a Decision Memo available for public review.

Moreover, as noted in our previous comments, we believe that all of the currently proposed Guidelines would be more appropriately included as Standards in order to provide for the protection of the CDT corridor and the visitor experience. We suggest that the currently proposed Guidelines be rewritten to include the changes reflected in italics below and included in the Draft Plan as Standards:

FW-STND-DTRL: If management activities result in short-term impacts to the scenic integrity of the Continental Divide National Scenic Trail, mitigation measures should be included, such as screening, feathering, and other scenery management techniques to minimize visual impacts within and adjacent to the trail *corridor* (within visible foreground, up to one-half mile *from* the trail at a minimum).

FW-STND-DTRL: To promote high-quality scenic, primitive hiking and horseback riding opportunities along the Continental Divide National Scenic Trail, the minimum trail facilities necessary to safely accommodate the amount and types of use anticipated on any given trail segment should be provided *in order to protect resource values and for visitor health and safety.*

FW-STND-DTRL: To conserve natural, historic, and cultural resources, the CDNST should not be used for landings or as a temporary road for any purpose.

FW-STND-DTRL: To conserve natural, historic, and cultural resources, hauling or skidding along the CDNST should be allowed only where the trail is currently located on an open road and no other reasonable options are available. *Design criteria should minimize impacts to the trail infrastructure, and any necessary post-activity trail restoration should be a priority for the project's rehabilitation plan.*

FW-STND-DTRL: *To provide for a naturally appearing setting and to avoid visual and resource impacts, unplanned and prescribed fires in the visible foreground (up to one-half mile) of the CDNST should be managed using minimum impact suppression tactics or other tactics appropriate for the protection of national scenic trail values. Construction of firelines by heavy equipment should not be allowed within the visible foreground of the CDNST unless necessary for emergency protection of life and property.*

FW-STND-DTRL: To protect the CDNST's scenic values, special-use authorizations for new communication sites, utility corridors, and renewable energy sites should not be *allowed* within the visible foreground (up to one-half mile) *and middleground viewshed (up to 4 miles) of the CDNST.*

FW-STND-DTRL: To maintain the integrity of the CDNST and the values for which it was designated, new linear utilities and special use authorizations that cross the trail should be avoided. Where unavoidable, these should be limited to a single crossing of the trail per special use authorization. *When authorized, linear facilities should be co-located with existing facilities.*

FW-STND-DTRL: *To provide for a naturally appearing, non-motorized setting and to avoid visual, aural and resource impacts from motorized use on the CDNST, constructing permanent and/or temporary roads or motorized trails across or adjacent to the trail should be avoided.*

Additionally, we suggest that the following provisions be added to the CDNST Plan Components as Standards or, at minimum, as Guidelines (consistent with the Recommended CDNST Forest Plan Components) in order to provide adequate protection for the CDNST and its corridor. We are particularly concerned that the working draft's current standards and guidelines do not address scenic integrity of the CDNST as a "high or very high" or "concern level one" corridor.

FW-STND-DTRL: No oil and gas or geothermal energy leasing activities shall occur within the CDNST corridor.

FW-STND-DTRL: To protect or enhance the scenic qualities of the trail, management activities in the CDNST corridor should be consistent with, or make progress toward achieving, Scenic Integrity Objectives of High or Very High.

FW-STND-DTRL: 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.

FW-STND-DTRL: To retain or promote 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. Road and motorized trail crossings and other signs of modern development should be avoided to the extent possible.

FW-STND-DTRL: Side trails to the CDNST enhance the experience along the main trail. Side trails are short trails that encompass adjacent attractions.

Scenery (SCNY)

The working draft contains a section on scenery plan components that appears to lump desired conditions for scenery of nationally designated trails into high public use areas, scenic byways, scenic travel corridors, and developed recreation sites. We believe the CDNST requires its own scenery plan components, and that these components should be standards.

From the working draft: FW-GDL-SCNY-03: To maintain or improve scenic character over the long-term and perpetuate high-quality scenic values consistent with the GMUG's distinctive roles and contributions, all forest management activities should be consistent with or move the area toward achieving desired scenic integrity objectives (SIOs). This includes shaping and blending any even-aged regeneration cuts to the extent practicable with the natural terrain. SIOs are both defined and associated to distinct Management Areas and overlays in Appendix 4 and mapped in the scenic integrity objective map.

Please see our comments below regarding the maps, SIO for the CDNST and other concerns.

From the working draft: FW-GDL-SCNY-05: To maintain scenic character for Concern Level 1 routes, large facilities (including, but not limited to, powerlines, gas wells, and power stations) should be screened, and vegetation should be managed to enhance the scenic quality within the immediate foreground (300 ft.).

Our previous comments recommended that the CDNST be identified as "Concern Level 1," yet the working draft does not appear to designate the CDNST as such. We also note that the planning components regarding the CDNST in the working draft provide for a ½ mile buffer for certain activities, which appears to conflict with the language provided in FW-GDL-SCNY-05.

Management Area Direction

The working draft defines management area direction in Appendix 3 and Table 8. We are very concerned that the CDNST does not have its own management direction, other than a generic statement that within 10 years of plan approval, the CDNST would be located off roads. This is included as a CDNST objective (see our comment above).

It appears that the working draft has lumped the CDNST into overall Forest management direction, which is inconsistent with the Recommended Forest Plan Components for the CDNST. In our previous comment letters, we urged the Forest Service to designate the CDNST as a Special Management Area with its own Unit Management Plan, and continue to believe that this is the best course of action. We are including our previous comments on this issue below:

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 CDNST Forests to designate the CDNST Corridor as a management area, or equivalent spatially identifiable area to provide for a consistent approach for establishing management emphasis for the CDNST across CDNST Forests.”²

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

CDNST Unit Plan

There is nothing in the working draft 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.” A Unit Plan can more clearly identify management parameters for future integrity of the purposes and nature of the CDNST. CDTC strongly recommends the use of a Special Management Area for the CDNST as a way to address these issues. A Unit Plan also would provide the public, partners, and future Forest Supervisors and staff with clear direction tiered from the Forest Management Plan.

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.

Almost all of these components are missing from the working draft. **CDTC encourages the inclusion in the draft and 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:

OBJ-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.

² 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

Scenic Integrity Objectives (SIOs)

Table 11 does not recognize the CDNST as having “very high” scenic value. It does recognize the Trail as having “high” value, with some exceptions. We are not clear what those exceptions might be, nor do we see how they would be applied to the CDT. In addition, the relationship between the CDNST’s SIO, the Recreational Opportunity Spectrum, and Concern Level is not defined. In our previous comments, we urged the Forest Service to designate the CDNST as having “very high to high” SIO; the ROS as being primitive to semi-primitive; and as a Concern Level 1 with regard to the Trail’s scenic values.

Designated Trails

The working draft section on Designated Trails contains four bullets that appear to apply to the CDNST, including direction to:

- identify Forest Plan components up to ½ mile on either side of the Trail (the visible foreground), or both;
- provide consistent signage along trail corridors and interpretive signage; and
- identify and pursue opportunities to acquire lands or rights-of-way in or adjacent to the CDNST corridor.

This direction regarding management of the CDNST appears to be disjointed from the remainder of the direction pertaining to the CDNST. This direction should be moved to the section on Standards. Furthermore, identification of a Special Management Area for the CDNST in the Forest Plan would provide for more consistent and precise direction, as well as be consistent with the Forest Service’s CDNST Planning Components and other planning direction pertaining to the CDNST.

Pack Stock Concerns

CDTC represents a myriad of users including many pack stock enthusiasts, including those who travel with pack goats. In the current version of the plan there is a proposal to ban pack goats citing their presence being a threat to the health of Bighorn Sheep. CDTC would like to see more significant research to demonstrate this position. To this end, we ask that you revisit the proposed pack goat ban on page 27 and consider removing the ban. We also ask you to reconsider the wording on page 143, "To increase awareness, educate partners and visitors of the potential for pathogen transmission affecting native plants and animals (e.g., recreation pack goats and bighorn sheep, the need to decontaminate wading boots to reduce spread of chytrid fungus, or whirling disease, etc.)" and remove recreation pack goats from this statement. Finally, we request that pack goats are added to the list of recreational activities under "Public Enjoyment" on page 8 as a legitimate user group of the GMUG.

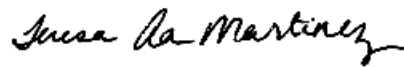
Other Concerns

We note that the maps included in the working draft do not include the CDNST. It is difficult to determine, for example, the ramifications to the trail by looking at the Scenic Integrity Overlay Map. In addition, the designated and recommended wilderness areas to be analyzed are mapped, but without an accompanying narrative, it is virtually impossible to interpret the maps. Our primary concern is that the CDNST would benefit from additional recommended wilderness areas (please see our 2018 comment letters regarding Wilderness Criteria and Assessments).

We also urge the Forest Service to analyze the “Citizens’ Conservation Proposal” as a viable alternative in its forthcoming Draft Management Plan/Environmental Impact Statement. Many of the components of the Proposal would provide for additional protection of the CDNST.

In closing, thank you for the opportunity to comment and participate in the ongoing process to revise Grand Mesa, Uncompahgre, and Gunnison National Forest Plan. We look forward to working with the entire Forest staff to ensure that the CDNST remains a high quality recreational resource across National Forest lands. Questions or follow up requests may be sent via email to Amanda Wheelock, CDTC Policy and Communications Manager at awheelock@continentaldivide-trail.org or by phone at 303-996-2759.

Sincerely,

A handwritten signature in black ink that reads "Teresa Ana Martinez". The signature is written in a cursive, flowing style.

Teresa Ana Martinez
Executive Director
Continental Divide Trail Coalition

Attachment: Recommended Forest Plan Components for the CDNST