



710 10th Street, Suite 200
Golden, CO 80401

October 17, 2022

Chad Stewart, Forest Supervisor
United States Department of Agriculture
U.S. Forest Service
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 South Main Street
Delta, CO 81416

Dear Forest Supervisor Stewart,

Thank you for the opportunity to provide comments regarding the Mt. Emmons Land Exchange. We are happy to assist you with this process and help you strive for the highest quality outcome possible, especially as it relates to the current alignment of the Continental Divide National Scenic Trail (CDNST) within the Gunnison National Forest. The proposed land exchange would help support a more optimal CDT experience for trail travelers, and CDTC is happy to provide comments in support of the proposed land exchange.

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. The CDNST was designated by Congress in 1978 as a unit of the National Trails System. The 3,100-mile CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West along the Continental Divide between Mexico and Canada. It travels through 20 National Forests, 21 Wilderness areas, 3 National Parks, 2 National Monuments, 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.

The CDNST passes through five states 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 2020, CDTC signed an Inter-agency Memorandum of Understanding with the U.S Forest Service, the Bureau of Land Management, and the National Park Service, which identifies the Continental Divide Trail Coalition as a lead national partner in the management and administration of the Continental Divide National Scenic Trail. 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 USFS budget.

Background

The Continental Divide National Scenic Trail (CDNST) is far more than a path on the ground; rather, it is the sum of the myriad scenic, natural, cultural, and historical qualities of the areas surrounding the trail that make a journey along the CDNST unique and spectacular. The CDNST is protected and maintained not only for the physical trail itself, but more importantly, for the experience it provides.

The United States Congress designated the Continental Divide National Scenic Trail by an Act of Congress in 1978. 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 is an essential tool for guiding decisions regarding Forest Plan direction for the CDNST. The Comprehensive Plan also incorporates FSM 2353.42 and 2353.44b.

Background Materials

CDTC has provided the following additional materials with our Scoping Comments:

1. CDNST Experience Statement
2. CDNST Optimal Location Review Guide

In consideration of these additional materials and upon review of Mount Emmons Land Exchange Proposal, we offer the following comments and recommendations:

The Continental Divide Trail Coalition supports the Mount Emmons Land Exchange Proposal since it will result in the protection of several strategic properties along or adjacent to the CDNST. The amended Comprehensive Plan from 2009 describes the nature and purposes of the CDNST:

“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.”

In general, there is a need to relocate the CDNST off of roads and ensure the intent of the 2009 Comprehensive Plan direction is met. CDTC encourages the use of the CDNST Optimal Location Review Process and guidance based on the CDNST Experience Statement (attached):

- a. It is the intention of Congress for the Continental Divide National Scenic Trail to be a primitive and challenging non-motorized trail traversing the Continental Divide from Canada to Mexico.
- b. New CDNST construction should link to existing non-motorized segments of trail, or a plan should be in place to address the motorized uses on either end in the near future in order to meet the intent of the CDNST as a non-motorized trail.
- c. All agencies should plan and construct the CDNST to include the following characteristics:
 - Built to a non-motorized standard – Fully accessible for foot and equestrian use.

- Portions accessible for mountain bikes where appropriate and consistent with Unit Plan direction.
 - Challenging – Requiring a need for self-reliance and backcountry skills.
 - Located through the most primitive, diverse and undeveloped landscapes on or near the Continental Divide.
 - Accesses or is routed near nationally significant scenic, historic, cultural and natural features.
 - Allows for an opportunity to view dramatic or unique scenery.
 - Allows for an opportunity to view wildlife.
 - Provides appropriate access to water sources.
 - Developed to the simplest, yet high quality standard.
- d. In addition to hiking and equestrian use, other uses will be considered only when they do not substantially interfere with the nature and purposes for which the CDNST was created. If allowed, they must be accompanied by a monitoring plan and be consistent with the unit/forest-wide direction for the CDNST in the area that takes into account carrying capacity. Regarding mechanized uses, we recommend not permitting these uses in proximity to CDNST segments in wilderness or recommended wilderness areas, or where there is no connectivity to existing mechanized trail routes. Furthermore, if allowed, trail segments should be designed from a hiker or equestrian perspective, and consider factors such as speed and line of sight distance in order to ensure a safe route for all users.

As proposed, the existing land exchange would help to bring the CDNST Experience closer to these desired conditions across the GMUG and Rio Grande National Forests.

Currently, one mile of the existing trail alignment goes through the Monchego Creek Ranch, and the two parcels in the Rio Grande National Forest are important components of the Sheep Creek Trail connections to the CDNST. The CDNST in this area is also a segment of the Colorado Trail (CT), a “thru-hike” trail for the State of Colorado and one of the State’s premier trails. This is an important area to conserve that will help ensure future improvements to the 13-mile stretch of the CDT between Pine Creek and Cochetopa Creek. The land exchange will help to ensure the access and enjoyability of the CDNST remains intact far into the future, and supports the potential optimal stewardship of the CDNST in this section for hikers, equestrians, thru-hikers, day visitors, and all others looking to explore this area. Currently, this section of the CDNST and CT mostly traverses Forest Service roads and agricultural areas that do not optimally align with the 2009 CDT Comprehensive Plan, which envisions a more primitive backcountry trail separating hikers and horsemen from motorized travel.

For future proposals and agency action, it would be most helpful for public review if the CDNST was delineated in agency materials concerning any proposed action. The CDNST and its corridor is not reflected in the South Map PDF. In order to fully identify all the impacts to the Trail from this proposed action, it must be reflected correctly on all project maps. (The CDNST is viewable via the [digital story map](#).) We respectfully request that you include the CDNST and its corridor in all future project maps and information if that CDSNT is within the area of the proposed action.

In closing, we are excited to see this step being taken on the part of the agency to ensure the access to the CDNST, the sustainability of the CDT Experience, and the enjoyability of the experience are not only protected, but optimized for trail users and stewards alike. As an organization with connections in the community and an expertise on CDNST policy guidance, CDTC welcomes consultation on any decision that could impact the trail. Furthermore, the CDTC is eager to share our resources (volunteer scouts, membership relations, fundraising abilities, volunteer labor, etc.) to work with the GMUG and Rio Grande National Forests to determine the optimal location for a non-motorized CDNST corridor through the area and assist in its implementation. Finally, CDTC is available and committed to supporting the planning and construction of this relocation.

We thank you for the opportunity to comment and participate in the management and protection of the CDNST. We look forward to working with the regional USFS staff and ensuring the CDNST remains a high-quality recreational resource across the Gunnison and Rio Grande National Forests. If you have any questions, please contact Luke Fisher, Trail Policy Program Manager, by phone at (406) 272-6179 or by email at Lfisher@continentaldividetrail.org.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Ana Martinez".

Teresa Ana Martinez
Executive Director
Continental Divide Trail Coalition

cc: Dan Dallas, RGNF Forest Supervisor; Anthony Edwards, GMUG NF Deputy Forest Supervisor; Corey Wong, GMUG NF Land Exchange Project Manager; Julie Nania, High Country Conservation Advocates; Matthew Hoyt, Gunnison County Attorney; Dara MacDonald, Town of Crested Butte; Todd Robertson, Western Land Group; Ben Lara, acting-CDNST Program Administrator