



**CONTINENTAL DIVIDE  
TRAIL COALITION**

710 10<sup>th</sup> Street, Suite 200  
Golden, CO 80401

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Perry Edwards, District Ranger  
United States Department of Agriculture  
U.S. Forest Service  
Pike-San Isabel National Forests  
5575 Cleora Road  
Salida, CO 81201

Patrick Mercer, District Ranger  
United States Department of Agriculture  
U.S. Forest Service  
Pike-San Isabel National Forests  
810 Front Street  
Leadville, CO 80461

Dear District Rangers Edwards and Mercer,

Thank you for the opportunity to provide comments regarding the **Dispersed Camping Management Project**. 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 **Continental Divide National Scenic Trail (CDNST)** within the Pike-San Isabel National Forests. While there are no direct impacts to the CDNST in the Salida Ranger District, the proximity and location of the proposed Interlaken and Forebay Campgrounds, as well as the Twin Lakes Peninsula Closure in the Leadville Ranger District will directly impact the CDNST. Overall, we applaud the engagement efforts put forth by the Forest Service with this project as it attempts to balance conservation and recreation values in an increasingly popular area with immense value to local communities and visitors from around the world.

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 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 proposal Comments below:

1. CDNST Experience Statement
2. Managing Recreational Uses on the CDNST

## **Current CDNST Route in the Dispersed Camping Management Project**

Most direct impacts of this project will not change the CDNST experience while on-trail, however trail users who stay overnight, section-hike, or thru-hike the entire CDNST will need to camp along the way. Many users along the CDT tend to avoid vehicle-based camping sites, but areas such as the Mt. Elbert, Turquoise Lake, Twin Lakes, Cottonwood Pass, Marshall Pass, Monarch Pass, and others directly connect to the CDNST or could be utilized by CDNST users to stay overnight. As campsites in these areas are closed off or actively managed, there tends to be a trickle down or "balloon" effect that may push people farther into the backcountry to look for cheaper options and/or more solitude, thereby potentially changing the CDNST experience.

Specific proposed actions under this plan that could impact the CDNST include the following:

- **Forebay Campground near Mount Elbert:** The co-located Colorado Trail (CT) and CDNST through this area traverses private property as part of the AngelView development to the south and the existing Lakeview Campground to the north. The map

shows the prospective new campground along FS125.B and a prohibited dispersed camping area that overlaps with the CDNST, as well as some vehicle-based designated camping outside this inner circle. Coordinating with the private property owners in this area will be important.

- **Interlaken Campground east of Twin Lakes:** A proposed campground would be built on top of the CT/CDNST right next to an important trailhead at the junction of the Collegiate West and East loops. Parking, camping, and informational signage are all concerns in this undeveloped but key area for public trail access.
- **Twin Lakes Peninsula Closure:** This closure is adjacent to the CT/CDNST for about one mile. While camping next to a riparian habitat and active reservoir system would not be recommended for trail users, education and enforcement will be needed in conjunction with protection of the Interlaken Lodge historic site.

**In consideration of these additional materials and upon review of the Dispersed Camping Management proposal, we offer the following comments and recommendations:**

CDTC in general supports the active management goals of the Salida and Leadville Ranger Districts in this collaborative plan regarding vehicle based camping. With increasing recreational pressures in the area, helping maintain the natural ecosystem by reducing human-made disturbances and ecological damage will continue to be paramount. CDTC agrees that a spectrum of camping options that include designated dispersed sites, new managed campgrounds, prohibiting camping in certain areas, and leaving existing management practices is an appropriate response to ensure people are recreating responsibly in our National Forests. Additionally, the work by Envision Chaffee County and the Chaffee County Outdoor Recreation Management Plan will continue to be an important resources in facilitating successful outcomes, especially in terms of wildfire mitigation, wildlife conservation, and specific adaptive management tools.

CDTC is concerned that segmenting rules across different areas and accurately assessing thresholds for appropriate management practices will consume a lot of time, energy, and resources by agency staff. CDTC agrees however that installing site posts, removing campfire rings, and creating sustainable infrastructure to manage waste is important so that visitors have the amenities they need. CDTC also stresses that education and outreach regarding these policy changes will be needed to ensure CDNST users and other visitors are not impacted negatively and are able to responsibly plan for their visit. Also, proactively anticipating visitors coming from the Front Range will help create an inclusive environment and reduce barriers for access while supporting local communities at the same time.

CDTC supports the action to develop and maintain certain types of developed and dispersed campgrounds because it opens up the opportunity for seasonal trail crew support. Many of these vehicle based recreation areas are within close proximity to the CT/CDNST, which has the potential to better support trail maintenance volunteers and trail adopters who frequent these stretches of trail. We would like to ensure that actions taken here are coordinated with other planning efforts in the area by the BLM and the National Forest Foundation through the [14ers Centennial Visioning Process](#). The high visitor totals in this area can be affected by people's interest in the 14,000 ft mountains in the area such as Mount Elbert and Shavano. As visitor use

management strategies continue to develop from these efforts, adaptive management will be needed to maintain integration with existing Forest Service plans. This will ensure that visitors are not just pushed to other areas without the requisite infrastructure, thereby exacerbating impacts to the natural environment.

To support these management actions, CDTC asks that any actions affecting the CDNST are consistent with the nature and purposes of the CDNST (see attached for the CDNST Experience Statement):

- 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. Any local planning updates, modifications to the existing CDNST, and/or new trail construction must involve cultural resource inventories of the area through engagement with Indigenous communities and Tribal consultation.
- c. 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.
- d. All agencies should plan and maintain 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.
- e. 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.

Adaptive Planning, Monitoring, and Carrying Capacity: Since 2012, CDTC has documented a dramatic increase in long-distance users of the CDNST, which represents only a minute fraction

of the total number of CDNST users. According to the 2022 Public Lands and Continental Divide Trail Survey in Colorado by the University of Wisconsin Whitewater and CDTC, 40% of Visitors to the CDNST are section hikers, 23% are day hikers, and only 7.2% of users are thru-hikers, with ancillary/future/other hikers making up the rest of the percentages. However, our data indicates that, on average, the number of attempted thru-hikes along the CDT has increased by 35% each year since 2013.<sup>1</sup> 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. Mapping of the most visited mountain passes in Colorado through the 2022 University of Wisconsin Whitewater study showed Monarch Pass at the high end of the dataset already, along with other popular access points like Berthoud Pass. With this increasing usage along the CDNST, trail users will inevitably be looking for diverse ways to experience the trail such as nearby vehicle based and overnight camping opportunities. We hope that agencies will continue to work with CDTC and other partners to keep planning for this increase in usage while maintaining an accessible space for the public to engage with nature.

Project Mapping and CDNST Awareness: For future proposals and agency action, it would be most helpful for public review if the CDNST was specifically delineated in agency materials concerning any proposed action. The CDNST and its corridor is not specifically noted in several of the project maps or the official notice. In order to fully identify all the impacts to the Trail from this proposed action and to support informed public participation, the trail and the trail corridor should be reflected correctly on all project maps. (The CDNST is viewable via the [digital interactive map](#).) We respectfully request that you include the CDNST and its corridor in all future project maps and information if the CDSNT is within the area of the proposed action. Additionally, CDTC would like to support the Forest Service with any potential changes to signage in the area as well as the utilization of digital platforms such as [Colorado Trail Explorer](#) and FarOut guides in helping notify the public of updates.

## Conclusion

CDTC is thankful for the opportunity to comment on the Dispersed Camping Management proposal. By taking the CDNST into consideration when establishing new campgrounds, creating camping restrictions, and drawing up maps, CDTC believes that this proposal has the ability to improve the recreational experience for many people while also mitigating potential ecological impacts in an increasingly popular area that overlaps with the Continental Divide landscape. Going forward, 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 Pike-San Isabel National Forest to determine the optimal conditions for the CDNST corridor through the area and assist in its implementation.

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 Pike-San Isabel National Forests.

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<sup>1</sup> Annual report CDTC Southern Terminus Shuttle report and annual completion survey report.

If you have any questions, please contact Jordan Williams, Colorado Conservation Fellow, by phone at (360) 244-9249 or by email at [Jwilliams@continentaldividetrail.org](mailto:Jwilliams@continentaldividetrail.org).

Sincerely,

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

Teresa Ana Martinez  
Executive Director  
Continental Divide Trail Coalition

cc: Ben Lara, CDNST Program Administrator