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June 18, 2025

Ryan Nehl
Forest Supervisor
% Deborah Kill
United States Department of Agriculture
Pike-San Isabel National Forests
5575 Cleora Rd.
Salida, CO 81201

Dear Forest Supervisor Nehl,

Thank you for the opportunity to provide comments regarding the **Dispersed Camping Management Project** Preliminary Environmental Assessment. 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. We appreciate your efforts to include the CDNST and Colorado Trail as part of the analysis while looking for ways to mitigate impacts to the trail experience.

Representing more than 2,500 supporters nationwide, the **Continental Divide Trail Coalition (CDTC)** is the national 501(c)(3) nonprofit organization working with federal land management agencies to complete, protect, and elevate the Continental Divide National Scenic Trail (CDNST).

Designated by Congress as a National Scenic Trail in 1978, the CDNST follows the Continental Divide for 3,100 miles through New Mexico, Colorado, Wyoming, Idaho, and Montana. The CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West, connecting communities, cultures, and landscapes.

The CDNST is administered by the U.S. Forest Service in cooperation with the National Park Service, the Bureau of Land Management, Tribal, state, and local governments, and numerous partner groups, including the CDTC. In 2020, CDTC signed an Inter-agency Memorandum of Understanding with the USFS, BLM and NPS, which identifies the Continental Divide Trail Coalition as a lead national partner in the management and administration of the CDNST.

Through its collaborative efforts, CDTC has successfully coordinated more than 250,000 hours of volunteer stewardship to maintain and improve the CDNST, built positive relationships with

federal land managers and local trail-focused groups, organized special events to help educate the public about the CDNST, implemented Trail Adopter and Gateway Community programs, and encouraged Congress to appropriate over \$12 million in 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 forward as policy in 2009. The *CDNST Comprehensive Plan* establishes the nature and purposes of the CDNST, which are “to provide high-quality, scenic and primitive hiking and horseback riding opportunities and to conserve natural, historic and cultural resources along the CDNST corridor.” This overarching policy direction serves to implement Congress’s direction in the National Trails System Act, and should be incorporated into all planning direction and project proposal evaluation. The *CDNST Comprehensive Plan* also incorporates FSM 2353.42 and 2353.44b.

Current CDNST Impacts in the Environmental Analysis:

The biggest impact to the CDNST corridor within this project occurs where the CDNST passes near a proposed designated dispersed camping area east of Twin Lakes off County Road 25, close to a trailhead at the junction of the Collegiate West and East loops (see appendix Map 6, Interlaken Road). According to the EA,

“This area includes proposed road additions and campsite layout. There are high levels of day use and dispersed camping in this area currently. Improving sanitation facilities and signing in this area would help alleviate concerns at the trailhead, and benefit trail users as well as campers.”

Other trails or trailheads close to the CDNST in the proposed project area include the Halfmoon Road proposed dispersed camping areas and the Clear Creek Road corridor, west of Winfield. The designated dispersed campsites near Halfmoon are east of the CDNST road crossing, while the proposed sites near Winfield are on either side of the CDNST intersection.

It appears the overall project scope has been downsized from the initial scoping period. In previously published documents, other areas were included, such as the camping zones within the Mount Elbert Forebay area and a camping closure of the Twin Lakes Peninsula. Concerns with vehicle-based dispersed camping in the Mount Elbert Forebay/FS Road 125.B remain due to the proximity to the CDNST/CT, adjacent private land owners, and potential wildfire issues. While this area will not be addressed as part of this project, CDTC recommends future planning in the Mount Elbert area to better accommodate sustainable visitor use.

Upon review of the Dispersed Camping Management Project, the Continental Divide Trail Coalition offers the following feedback:

CDTC appreciates the consideration of the trail corridor in designated sites and parking areas off County Road 26 east of Twin Lakes within the Design Standards section. This design will help to avoid adverse visual, experiential, or physical impacts to the CDNST, while also supporting

the CDT Comprehensive Plan's goal to "locate developments... to minimize intrusion on the trail experience." CDTC would suggest also adding additional amenities such as pit toilets or drinking water access in this area to ultimately reduce natural resource impacts and improve the visitor experience since many trail users utilize this area as part of a CDT/CT Collegiate loop opportunity.

For the Halfmoon and Clear Creek Road areas, CDTC supports the the layout of designated dispersed areas to include consideration of trail/road crossing points to minimize conflicts and maintain the camping and trail user experience. CDTC agrees that clustering campsites to reduce unmanaged sprawl, trash, and human waste, as well as reducing social trails that might encroach into riparian zones, has the opportunity to positively impact the trail's scenic and primitive qualities in relation to trail aesthetics and viewsheds. This effort is in alignment with the CDT Comprehensive Plan. While the backpacker and "thru-hiker" communities are important considerations, even more trail users access the CDNST during day hikes and from vehicle based camping areas. CDTC agrees with the project design to consider the needs of these different groups.

With staffing and funding challenges facing the Forest Service, CDTC understands that the pace and scale of implementation may be impacted. However, with additional volunteer support and private funding opportunities, local organizations and partners (including CDTC) can attempt to help mitigate negative impacts, such as the potential for a wildfire on the north side of Twin Lakes that could have even larger impacts than the Interlaken Fire from 2024. Additional infrastructure in camping areas or Forest Orders requiring self-contained toilets/waste bags removal could also be beneficial in reducing impacts to natural resources in the area.

With the CDNST/CT being marked on the individual area maps, CDTC appreciates the Leadville and Salida Ranger Districts continuing to prioritize these trail corridors. CDTC also suggests additional efforts around signage and education, including Spanish language materials, to ensure the area is used by a wide group of people. CDTC also feels that adaptive management and monitoring will be necessary as dispersed camping areas are redesignated in the event that these efforts push people to other areas on the Forest/Bureau of Land Management sites.

CDTC recognizes there is much to be done to address the issues facing the Pike-San Isabel National Forest alongside other ongoing planning processes including the Twin Lakes Vegetation management plan, Halfmoon Road project realignment, and Monarch Mountain/No-Name Basin development that also impact the overall project area. CDTC remains committed to the USFS as a shared stewardship partner to address these identified needs and any future opportunities through an adaptive management process that ensures the land is meeting the needs of visitors while also offering innovative and creative solutions to maintain public access to public lands.

Conclusion

CDTC appreciates the opportunity to comment on the Dispersed Camping Management proposal and believes that this proposal has the ability to improve the recreational experience for many people, in addition to mitigating potential ecological impacts in an increasingly popular area that overlaps with the Continental Divide landscape. As this project moves forward, CDTC offers our

expertise on CDNST policy guidance and implementation and our role as a convener with trusted relationships in the community, and we welcome consultation on any decision that could impact the trail. Continued inter-agency and partner coordination will be crucial to ensuring the CDNST's integrity is upheld, especially under increasing recreation pressure. 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. If you have any questions, please contact Jordan Williams, Colorado Regional Representative, by phone at (360) 244-9249 or by email at jwilliams@cdtcoalition.org.

Sincerely,

A handwritten signature in cursive script that reads "Jordan Williams".

Jordan Williams
Colorado Regional Representative
Continental Divide Trail Coalition

cc: Claire Cuter, CDTC Trail Policy Specialist; L Fisher, Director of Trail Programs; Ben Lara, CDNST Program Administrator