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Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUGy

Attn: Forest Plan Revision Assessment

2250 South Main Street

Delta, CO 81416

Dear Forest Supervisor and Planning Team:

The Continental Divide Trail Coalition is writing to provide our comments and recommendations to the Draft Assessment as it relates to the Continental Divide National Scenic Trail (CDNST). We appreciate the opportunity to provide our thoughts and hope they help support the best process possible for the future management of the CDNST on the GMUG.

The Continental Divide Trail Coalition (CDTC) was formed in 2012 to work with the federal land management agencies in the completion, management and protection of the Continental Divide National Scenic Trail (CDNST). The CDTC is a 501(c)(3) nonprofit organization with 2000 members nationwide. To date, CDTC has been successful in coordinating volunteer stewardship to improve and complete the CDT, building positive relationships with the federal land managers and local trail focused groups, organizing special events to help educate the Public about the CDT, implementing an Adopt-A-Trail and Gateway Community Program, and encouraging Congress to continue to appropriate \$7 million in funding specific for the CDT in the Forest Service budget. In May, 2014, CDTC signed a Memorandum of Understanding to establish our role as a national organization working in partnership with the US Forest Service on behalf of the Continental Divide National Scenic Trail.

Background

The Continental Divide National Scenic Trail (CDNST) was designated by Congress in 1978 as a unit of the National Trails System. The 3,100 mile CDNST traverses the Continental Divide between Mexico and Canada. It travels through 20 National Forests, 21 Wilderness areas, 3 National Parks, 1 National Monument, 8 BLM resource areas and through the states of Montana, Idaho, Wyoming, Colorado and New Mexico. The CDT is a 3,100 mile long 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 CDT is the highest and most rugged of the national scenic trails, reaching 14,270 foot summit of Grays Peak in Colorado, and connects a diversity of landscapes - from desert to glacier, and remote wilderness to front country experiences. Regardless of the terrain, the idea of primitiveness is paramount and the user often encounters an experience much more primitive than the ROS might suggest. The Nature and purpose of the CDT 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 CDT Corridor. 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 designed should be avoided to the extent practical (16 USC 1246) . The overarching management direction for the CDT is outlined in the 2009 Comprehensive Plan.

The CDT Experience is defined in the Continental Divide National Scenic Trail Study Report as an "intimate one, where one can walk or ride horseback across vast fields of wildflowers and contemplate a story dating from the dawn of earth's history...along the way the tranquility of the alpine meadows, verdent forests and semi-desert landscape overwhelms anyone who passes that way. The Trail would provide the traveler his best encounter with the Continental Divide-its serenity and pure air-and would supply for every trail traveler some of the world's most sublime scenes."

CDNST Comprehensive Plan Direction:

The CDNST Comprehensive Plan was set forth as policy in 2009. This policy direction is the implementation of the National Trails System Act and is the over-arching policy that should be incorporated into Forest Plan direction and project proposal evaluation.

GMUG Draft Assessments and Need for Change

We are encouraged by the Draft Assessments (Recreation and Special Designation Areas) acknowledgment of the CDNST. Specifically, the Draft Special Designation Area (SDA) Assessment states a need to "manage uses and restrictions" consistent with the USFS 2009 CDNST Plan. However, the Assessment stops short in disclosing, in any detail, existing management direction, conditions, need for change for the Trail as a whole.

The Assessment does direct the reader to "see the 2009 CDNST Comprehensive Plan." (p. 15) Opportunity Spectrum (ROS) for the CDNST. However, in reviewing both the Draft Recreation and SDA Assessments, it is unclear what the existing ROS classification is for the Trail and how it overlaps with surrounding areas.

The Assessment should set forth direction that the CDNST be included as a "primitive and semi-primitive" classification as well as "High Scenic Value."

Chapter 6 of the Assessment (p. 50) notes that some portions of the CDNST is currently open to bicycle and motorized uses. It would be useful to our members to identify in a narrative and maps where these uses are occurring, the condition of the Trail in those areas, and goals/direction/objectives as well as criteria for relocating the Trail. Specifically in those areas where the CDT is on open roads versus a constructed trail and any goals for the future development of new trail.

A revised Assessment and Need for Change should include the following considerations:

1. There is a need to reconsider the overall management and direction in the GMUG Forest Plan for the CDNST.
2. There is a need to review new uses allowed along the CDNST route in order to prevent substantial interference to the nature and purpose for which the Trail was created. This would include the establishment of monitoring programs and LAC type management actions prior to allowing any new uses, to ensure the Nature and Purpose for which the Trail was created are not negatively impacted by such uses.
3. There is a need to establish and incorporate a monitoring program (consistent with the CDNST Comprehensive Plan) for the CDNST that addresses uses and carrying capacity of the Trail and its corridor.
4. There is a need to update and incorporate the Scenery Management System for the forest with specific consideration of the existing and high potential route segments for the CDNST.
5. There is a need to review the inclusion and support of volunteer stewards and youth corps partners in the management, maintenance, and relocation of the CDNST where segments are currently experiencing bicycle and motorized uses.
6. There is a need to ensure identification, provision, development, and access to water resources for users along the CDNST in the GMUG Forest.
7. There is a need to update the Recreation Opportunity Spectrum classifications and adjust the total acres in each class in the revised forest plan specifically for the CDNST across the forest.
8. There is a need for a clear and explicit direction statement that describes forest policy on the inclusion of recreational use on the CDNST.
9. There is a need to provide forest direction on the management of snowmobiles/over-snow vehicles
10. There is a need for an inventory of existing CDNST trailheads and access points ensure that appropriate access to the Trail is provided. This includes the development of consistent Trail design across all GMUG Forest Areas across which the CDNST Corridor traverses.
11. There is a need to address the CDNST as a Corridor and special designation area in the revised forest plan and reflect the corridor on maps and Forest information resources.
12. There is a need to address permitting for large and/or recurring special /recreational events, including competitive events and shuttle services along the CDNST Corridor. This should include evaluation of the carrying capacity of the Trail Corridor to sustain such uses and their impacts to the nature and purposes for which the CDNST was created.
13. There is a need to update and address existing and proposed energy and utility developments, as well as extraction activities along the CDNST Corridor in the GMUG National Forest.

14. There is a need to include management direction for the CDT as specified by the new Forest Plan Component Document recently approved by the USFS guiding management across all US Forest Service Units.

15. There is a need for the preparation of a CDT unit plan that will establish the Trail Class, Managed Uses, Designed Uses, and Design Parameters, as well as uses that are prohibited, on trail segments.

16. 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 newly adopted CDT Optimal Location review Process (attached) and include the following factors be included in this process:

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 most simple, yet high quality standard.

Thank you for the opportunity to comment and participate in the ongoing process to revise the GMUG Forest Plan. We look forward to working with the entire Forest staff and ensuring the CDNST remains a high quality recreational resource across the GMUG Forest.

Sincerely,

Teresa Ana Martinez /s/

Teresa Ana Martinez

CDTC Director

cc: Brenda Yankoviak, Acting CDNST Program Administrator; Jim Wolf, Director Continental Divide Trail Society